

# Solvency and Financial Condition Report

UNIQA Biztosító Zrt.  
31 December 2022

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## Executive Summary

The following summary presents in a compact way the most important facts regarding the solvency situation of UNIQA Biztosító Zrt. and gives an overview of the report content.

Despite external challenges, we managed to outperform our plans for last year, particularly in our non-life business, a strategic area where we achieved a 15% growth in 2022. Despite the current difficult market situation that also affects our customers, the strategic measures we took led to a considerable increase in the number of policies in our focus products.

In **Chapter A. Business and Performance** we present the company and the underlying business model with the most important figures presenting the business volume, the claims side and the investment result.

- UNIQA Biztosító Zrt., owned to 100% by UNIQA International AG, provides its customers with Property and casualty-, health- and life insurance products.
- Insurance products are provided for retail clients as well as corporate clients and the insurance products are sold via a multi-channel strategy, like exclusive sales, general agencies, brokers and bank sales.

With this wide range product portfolio and the strong sales channel UNIQA Biztosító Zrt. covers the insurance and risk protection needs of its clients. An integral part of the insurance products is the service for the customer. It is the clear target for UNIQA Biztosító Zrt. to deliver excellent service quality to our clients.

With this approach UNIQA Biztosító Zrt. diversifies the insurance technical risk and has well composed portfolio in force as shown on Figure 1.

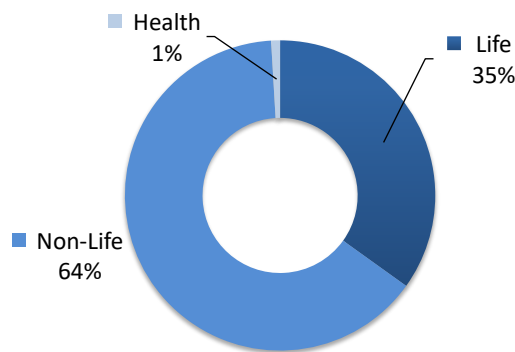


Figure 1. Share of portfolio segments by Gross Written Premium in 2022

All strategic and operational initiatives and activities we implemented in 2022 contributed to maintaining and improving customer satisfaction; as a result, in addition to expanding our customer base, we scored 4.8 in our customer satisfaction survey.

The services provided to our customers remained our top priority last year. In 2022, we continued to improve and redesign customer-facing processes in order to achieve our strategic objectives and even

higher customer satisfaction scores, while also focusing on designing, developing and implementing a new distance sales process and new digital customer processes.

In line with our strategic directions, our commitment to digital transformation in both sales and services resulted in a wide range of automated sales processes and more efficient internal workflows. We laid the foundations of our data-driven decision-making and are committed to ensure the best value creation and smoother user experience to our customers through all channels in the future, deploying the required advanced data-driven technology.

In the retail business line, we are still focusing on offering the best possible value proposition by charting end-to-end customer journeys designed on the basis of real customer needs. We continued the improvement of our digital channels to put in place multichannel customer service.

The corporate business line introduced a new operational model, processes and organisational structure in May 2022. Our organisational reform is aimed at being as close as possible to our sales partners in the market for corporate insurance and to serve all our customers to an even higher standard. We established three regions, Western, Central and Eastern, with the specific aim of providing full service in the corporate sector. Heads of regions are experts in corporate insurance and assist all our partners in corporate insurance issues.

In the field of non-life insurance, the main focus remained on the optimization and standardization of our customer-facing processes. Both our retail and corporate businesses concentrated on providing modern, fast and outstanding service to their customers. In process-driven retail customer service, we focused entirely on customer experience, from the inception of the product concept through sales to claims settlement. In order to back-test the results of our efforts and optimize our processes, we implemented a new customer satisfaction measurement system. One of our priority projects in 2022 was drawing up our application for Certified Customer-Friendly Home Insurance which earned us the certification and we started selling the product on 13 January 2023.

2022 was a year full of challenges, yet a successful business year for the personal insurance business line. In the individual personal insurance business, the largest contributors to growth in our premium revenues were primarily our accident insurance products and secondly our life insurance products. For our unit-linked life insurance products, we introduced sustainability-driven asset funds and gave particular focus to identifying the sustainability preferences of our customers during pre-sales customer needs assessment. In the corporate business line, we updated our risk product covering life, accident and health insurance needs in 2022 and we were able to target additional segments as a result, contributing to growth in the business line.

In 2022, the Company achieved gross written premium of 88.0 billion HUF. Life related part is 31.5 billion HUF with 0.8 billion HUF Health part, whereas non-Life premium is 56.5 billion HUF. Total GWP increased by 8.6% versus last year mainly driven by Non-Life growth. UNIQA Biztosító Zrt. closed the reporting period with successful new business acquisition and policy renewals. Life gross written premium decreased by 0.2 billion HUF versus prior year driven by the Single Life business. Non-life portfolio increased by 14.7% mostly driven by the Motor and Fire and other damage to property line of businesses. Detailed figures to the various Lines of Business are shown in chapter A.2.

As shown in **Chapter B. System of Governance**, UNIQA Biztosító developed an organisational structure in line with the legal requirements and which reflects the principles of the “three lines of defence”. This organisational concept clearly differentiates between the parts of the organisation which take and actively manage business risks (first line of defence) and parts of the organisation which

overview and monitor the risk situation (second line of defence). The third line of defence manages the independent monitoring of the 1st and the 2nd line of defence. Further details are described in the chapter B.3.2.

The Board of UNIQA Biztosító Zrt. is supported by various committees in the decision-making process (please see related details in B.1.4). These committees cover issues regarding executive management, risk management, product development management and reserving. Structured management information and reporting points are defined and discussed. Furthermore, the Solvency 2 key functions, the actuarial function, the risk management function, the compliance function and the internal audit function are implemented with the respective processes. Clear remuneration rules (B.1.6) and the requirements to the business qualifications („Fit“) and personal integrity („Proper“) of persons which lead the company and other key functions (B.2), are part of a state of the art governance model.

A central part of the governance structure is the risk management system. It defines the responsibilities, the processes and the general rules which enable the company to manage the risks in an efficient and proper way. It is the clear aim of the risk management system to support the management to safeguard the management of financial losses and to provide the information for operative and strategic business decision making. In that respect the own risk and solvency assessment process plays an important role.

The capital requirement to be covered by own funds, defined as a potential economic loss within one year with a probability of 1:200, is the main pillar in quantitative focus of Solvency II. In **Chapter C. Risk Profile** the details of the composition of the capital requirement can be found. Furthermore, the background information to the calculation details is provided. The section comprises information to the major risks an insurance company is facing: the insurance technical risks, market risks, credit- and counterparty default risks and furthermore operational risks. As a multiline insurer UNIQA Biztosító Zrt. is very well diversified.

The subsequent overview shows the capital requirement of the different risk modules, the whole solvency capital requirement and the related own funds.

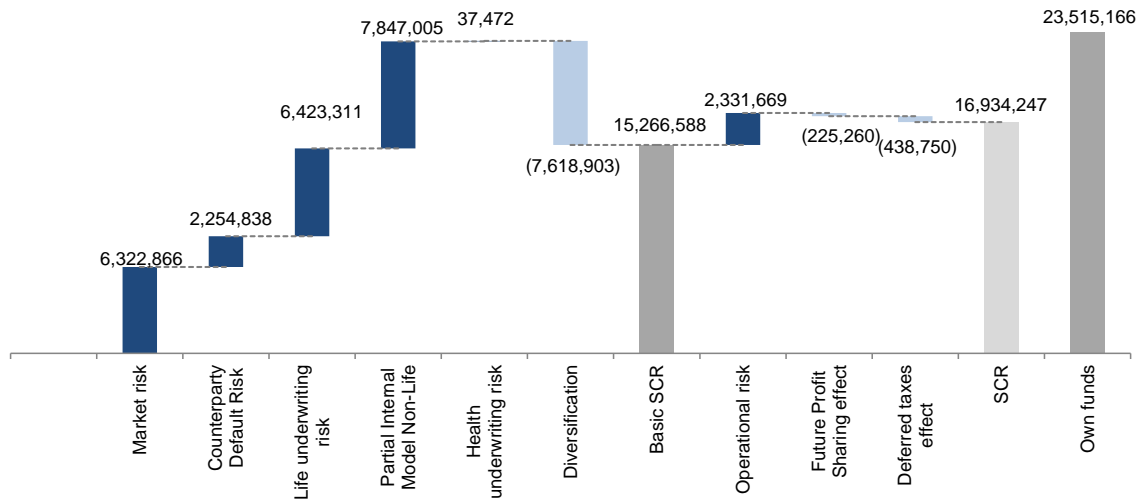


Figure 2. Overview of capital requirements and own funds (Thousand HUF)

The underwriting risk of the life and non-life business together with market risk dominate the risk profile of UNIQA Biztosító.

The Solvency 2 ratio with 138.9% shows capitalization of UNIQA Biztosító Zrt. complying with the Solvency 2 Delegated Regulation (details see C.7). This ratio is not in line with MNB Guideline 6/2016. (VI.14.) and the undertakings internal limit system. The company strives to comply with these as well and therefore a plan to remedy the situation will be put in place. Stress test and sensitivity calculation regarding risk drivers and the impact on the solvency situation are made on a regular basis to receive additional information regarding the quality and level of capitalization.

Furthermore, UNIQA Biztosító Zrt. is the only insurance company in Hungary which uses a Partial Internal Model for the calculation of the solvency capital requirement of the non-life underwriting risk for solvency requirement calculations. The model was approved by the College of Supervisors in December 2017. The model is used to gather further deep insight and additional analysis for the management of the underwriting risk non-life.

In **Chapter D. Valuation for Solvency Purposes** the methods for the valuation of the single balance sheet positions for the setup of the economic balance sheet are explained and these balance sheet positions are compared with the local GAAP values.

Finally, in **Chapter E. Capital Management** the derivation from the economic capital to the eligible own funds is performed. UNIQA Biztosító Zrt.'s capital consists of tier 1 capital and from first quarter of 2019 a tier 2 capital strengthens its solvency position with an additional tier 2 capital from the end of 2022. The eligible own fund amounts to 23,515,166 thousand HUF and covers the solvency capital requirement of 16,934,247 thousand HUF.



## A. Business and Performance

### A.1 Business

UNIQA BIZTOSÍTÓ Zrt.  
Róbert Károly körút 70-74  
1134 Budapest  
www.uniqa.hu

UNIQA Biztosító Zrt. is supervised by the Hungarian National Bank.

Felügyelet – MNB  
Krisztina körút 39  
1013, Budapest  
www.mnb.hu/felugyelet

For the current financial year PwC Auditing Ltd. was our appointed auditor.

PricewaterhouseCoopers Könyvvizsgáló Kft.  
Bajcsy-Zsilinszky út 78.  
1055 Budapest  
www.pwc.com/hu

#### Shareholder structure

UNIQA Biztosító Zrt. is owned to 100% by UNIQA Österreich Versicherungen AG.

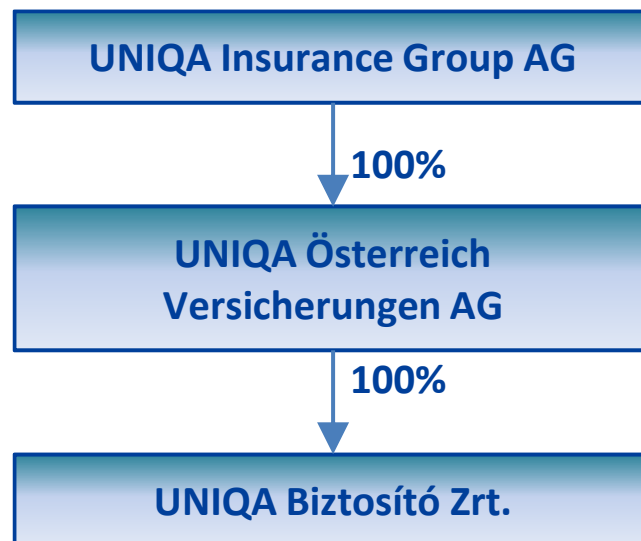


Figure 3. Shareholder structure of UNIQA Biztosító Zrt.

**Essential business units**

<b>Name of the business unit</b>	<b>Share % (direct)</b>
UNIQA Claims Services International Kft.	99.63%
UNIQA Ingatlanhasznosító Kft.	99.98%

Table 1. Subsidiaries of UNIQA Biztosító Zrt.

**Business lines and business development**

Despite external challenges, we managed to outperform our plans for last year, particularly in our non-life business, a strategic area where we achieved a 15% growth in 2022. This growth is largely attributable to our focus products, including motor, household and accident insurance, with the new FLEXA product being another significant contributor in the corporate business line. At the same time, it can be said that we were able to grow in all active business lines in property insurance.

Despite the current difficult market situation that also affects our customers, the strategic measures we took led to a considerable increase in the number of policies in our focus products, especially in household and accident insurance.

All strategic and operational initiatives and activities we implemented in 2022 contributed to maintaining and improving customer satisfaction; as a result, in addition to expanding our customer base, we scored 4.8 in our customer satisfaction survey.

The services provided to our customers remained our top priority last year. In 2022, we continued to improve and redesign customer-facing processes in order to achieve our strategic objectives and even higher customer satisfaction scores, while also focusing on designing, developing and implementing a new distance sales process and new digital customer processes.

In line with our strategic directions, our commitment to digital transformation in both sales and services resulted in a wide range of automated sales processes and more efficient internal workflows. We laid the foundations of our data-driven decision-making and are committed to ensure the best value creation and smoother user experience to our customers through all channels in the future, deploying the required advanced data-driven technology.

In the retail business line, we are still focusing on offering the best possible value proposition by charting end-to-end customer journeys designed on the basis of real customer needs. We continued the improvement of our digital channels to put in place multichannel customer service.

The corporate business line introduced a new operational model, processes and organisational structure in May 2022. Our organisational reform is aimed at being as close as possible to our sales partners in the market for corporate insurance and to serve all our customers to an even higher standard. We established three regions, Western, Central and Eastern, with the specific aim of providing full service in the corporate sector. Heads of regions are experts in corporate insurance and assist all our partners in corporate insurance issues.

**Property insurances**

Thanks to a continuous loss and cost control, and timely pricing measures, the business line had a positive technical result despite the extremely high inflationary environment seen in 2022.

In the field of non-life insurance, the main focus remained on the optimization and standardization of our customer-facing processes. Both our retail and corporate businesses concentrated on providing modern, fast and outstanding service to their customers. In process-driven retail customer service, we focused entirely on customer experience, from the inception of the product concept through sales to claims settlement. In order to back-test the results of our efforts and optimize our processes, we implemented a new customer satisfaction measurement system.

The retail non-life business also faced considerable challenges in the second half of the year, particularly due to the accelerating inflationary environment. However, by continuously monitoring loss inflation and giving prompt and effective response to changes in the market, we were able to ensure that customers have adequate insurance protection despite the volatile environment and that claims are compensated at current price levels. Although facing difficult market conditions, we managed to achieve significant growth in focus products set out in our strategy: in case of both home and motor vehicle insurance.

One of our priority projects in 2022 was drawing up our application for Certified Customer-Friendly Home Insurance which earned us the certification and we started selling the product on 13 January 2023.

In the corporate business line, we achieved the strongest growth specifically in areas where we have the greatest earnings potential, particularly in the non-life and non-vehicle business lines (corporate property insurance, technical insurance, cargo insurance). We gave special attention to counteracting inflation in these business lines as well.

### **Personal insurance**

2022 was a year full of challenges, yet a successful business year for the personal insurance business line.

In the individual personal insurance business, the largest contributors to growth in our premium revenues were primarily our accident insurance products and secondly our life insurance products.

Customers' increased willingness to take up self-support after the pandemic made a significant contribution to the increase in accident insurance premiums and, building on that, we further expanded the range of coverage offered by our accident insurance products mid-year. Our new acquisitions in life insurance came close to the level of our outstanding performance in 2021, despite the inflationary pressures felt throughout the year, considerably reducing households' propensity for saving compared to the previous year. Another factor that made selling savings products harder throughout 2022 was the interest rate hike cycle of central banks globally, which had a negative impact on the valuation of investment products.

For our unit-linked life insurance products, we introduced sustainability-driven asset funds and gave particular focus to identifying the sustainability preferences of our customers during pre-sales customer needs assessment.

In the corporate business line, we updated our risk product covering life, accident and health insurance needs in 2022 and we were able to target additional segments as a result, contributing to growth in the business line.

## A.2 Underwriting Performance

The following chapter presents the technical performance of the UNIQA Biztosító Zrt. during the reporting period. The information is qualitatively and quantitatively presented in both aggregated form as well as broken down to the essential business units and geographic areas, where UNIQA Biztosító Zrt. operates during the reporting period. Subsequently, the information presented in this report is compared to the data collected in the last reporting period and presented in the financial statements of the company.

### Premium development

The pandemic situation of the year 2020 hit Hungary hard as well, however its impact is already fading in 2022. While in 2020 and even in 2021 the pandemic had a more significant impact on the company's financial results, in 2022 the insurance market had to face other challenges. In 2022, the Hungarian Government imposed an extraordinary tax on financial and other (commercial airlines, medicine distributors, telecommunication companies, etc.) sectors. As the base of the special tax is the insurance premium for the insurance companies, it caused a slight realignment in the Company's portfolio in the second half of the year. The sale of the single life premium products significantly dropped compared to the prior year as the tax burden has a significant impact on the life profit.

In 2022, the Company achieved gross written premium of 88.0 billion HUF. Life related part is 31.5 billion HUF with 0.8 billion HUF Health part, whereas non-Life premium is 56.5 billion HUF. Total GWP increased by 8.6% versus last year mainly driven by Non-Life growth. UNIQA Biztosító Zrt. closed the reporting period with successful new business acquisition and policy renewals. Life gross written premium decreased by 0.2 billion HUF versus prior year driven by the Single Life business. Non-life portfolio increased by 14.7% mostly driven by the Motor and Fire and other damage to property line of businesses.

In the aspect of premium paying frequency more than 85% of the gross written premium derive from contracts with regular payment.

**Premiums, claims and expenses - Non Life**

<b>Gross (th HUF)</b>	<b>2022</b>	<b>2021</b>
Premiums written	56,477,752	49,255,622
Premiums earned	53,682,503	48,254,294
Claims incurred	25,077,860	22,765,526
Changes in other technical provisions	-147,244	265,933
Expenses incurred	18,703,154	16,605,128

Table 2. Gross premiums, claims and expenses comparison - Non Life

**Premiums, claims and expenses by line of business - Non Life**

in Thousand HUF	Premiums written - Gross 2022	Premiums earned - Gross 2022	Claims incurred - Gross 2022	Changes in other technical provisions - Gross 2022	Expenses incurred - Gross 2022
Medical expense insurance	-	-	-	-	-
Income protection insurance	4,083,784	3,993,723	1,202,978	79,455	2,158,812
Workers' compensation insurance	-	-	-	-	-
Motor vehicle liability insurance	16,212,520	15,962,457	8,545,776	137,022	4,705,233
Other motor insurance	16,425,632	15,702,968	9,373,617	16,769	4,650,152
Marine, aviation and transport insurance	770,788	729,631	109,110	23,385	268,123
Fire and other damage to property insurance	12,554,773	11,482,810	2,618,992	54,555	4,388,963
General liability insurance	2,200,844	2,227,386	1,303,140	38,158	854,403
Credit and surety insurance	-	-	-	-	-
Legal expenses insurance	11,815	12,105	13,678	-	981
Assistance	576,800	575,205	208,986	2,017	424,273
Miscellaneous financial loss	3,640,797	2,996,220	1,701,583	7,635	1,252,215
<b>Total</b>	<b>56,477,752</b>	<b>53,682,503</b>	<b>25,077,860</b>	<b>147,244</b>	<b>18,703,154</b>

Table 3. Gross premiums, claims and expenses by line of business - Non Life

The gross premium written of Life business for reporting period was 31.5 billion HUF, the 0.7% decrease versus prior year is driven by the drop in single life business insurance acquisition due to the extraordinary tax.

Life insurance regular portfolio lifecycle is on maturity stage. Table below excludes investment result.

**Premiums, claims and expenses - Life**

<b>Gross (th HUF)</b>	<b>2022</b>	<b>2021</b>
Premiums written	31,541,267	31,769,675
Premiums earned	31,531,445	31,703,598
Claims incurred	22,533,689	19,531,260
Changes in other technical provisions	8,661,657	-16,356,471
Expenses incurred	7,139,892	7,035,355

Table 4. Gross premiums, claims and expenses comparison - Life

**Premiums, claims and expenses by line of business - Life**

in Thousand HUF	Premiums written – Gross 2022	Premiums earned - Gross 2022	Claims incurred - Gross 2022	Changes in other technical provisions - Gross 2022	Expenses incurred - Gross 2022
Health insurance	817,717	827,951	279,111	-	4,304
Insurance with profit participation	1,026,966	1,033,327	1,499,654	500,776	371,049
Index- and unit-linked insurance	27,509,748	27,509,748	19,852,613	8,081,455	5,519,964
Other life insurance products	2,186,836	2,160,418	902,310	83,731	1,245,403
<b>Total</b>	<b>31,541,267</b>	<b>31,531,445</b>	<b>22,533,689</b>	<b>8,661,657</b>	<b>7,139,892</b>

Table 5. Gross premiums, claims and expenses by line of business - Life

The company net Non-Life premium without reinsurance part is 27.3 billion HUF, which results a 15.5% improvement versus previous year. The 56% of Non-Life premium derive from Motor portfolio, it is slightly below the last year's share. However, the share of the Fire and other damage to property insurance portfolio increased by 1.2 percentage points compared to prior year. In case of Motor insurance strong increase is observable both MTPL (13.4%) and Casco (11.2%) lines. The Fire and other damage to property insurance has showed even higher improvement in 2022 than in 2021, the net premium of this LoB increased by 23.4% compared to prior year. Besides the Fire and other damage to property insurance, the Assistance and Miscellaneous financial loss line of businesses increased significantly compared to prior year in terms of net written premium, although they total share from the Non-Life net written premium is below 8%.

In 2022, while the claims frequency was lower than prior year, the average claim amount significantly increased compared to 2021 due to claims inflation. However, the gross technical result of the Non-Life business was affected by larger claims and changing weather conditions too, it was higher than in 2021.

**Premiums, claims and expenses - Non Life**

<b>Net (th HUF)</b>	<b>2022</b>	<b>2021</b>
Premiums written	27,328,499	23,660,399
Premiums earned	26,051,765	23,123,611
Claims incurred	11,825,856	10,066,935
Changes in other technical provisions	33,506	227,762
Expenses incurred	8,165,267	6,995,522

Table 6. Net premiums, claims and expenses comparison - Non Life

**Premiums, claims and expenses by line of business - Non Life**

in Thousand HUF	Premiums written - Net 2022	Premiums earned - Net 2022	Claims incurred - Net 2022	Changes in other technical provisions - Net 2022	Expenses incurred - Net 2022
Medical expense insurance	-	-	-	-	-
Income protection insurance	3,805,813	3,716,124	1,142,151	81,150	2,055,701
Workers' compensation insurance	-	-	-	-	-
Motor vehicle liability insurance	7,730,970	7,606,228	3,689,708	-	1,812,162
Other motor insurance	7,625,886	7,264,796	4,664,809	-	988,540
Marine, aviation and transport insurance	266,533	244,480	52,212	-	130,262
Fire and other damage to property insurance	5,165,939	4,657,547	1,054,093	14,567	1,691,618
General liability insurance	688,896	734,561	281,880	32	465,194
Credit and surety insurance	-	-	-	-	-
Legal expenses insurance	11,815	12,105	13,678	-	981
Assistance	576,800	575,148	206,642	1,140	424,251
Miscellaneous financial loss	1,455,848	1,240,776	720,685	13,809	596,558
<b>Total</b>	<b>27,328,499</b>	<b>26,051,765</b>	<b>11,825,856</b>	<b>33,506</b>	<b>8,165,267</b>

Table 7. Net premiums, claims and expenses by line of business - Non Life

**Premiums, claims and expenses - Life**

<b>Net (th HUF)</b>	<b>2022</b>	<b>2021</b>
Premiums written	31,152,955	31,382,872
Premiums earned	31,151,601	31,316,662
Claims incurred	22,380,263	19,411,484
Changes in other technical provisions	8,661,890	-16,356,431
Expenses incurred	7,013,381	6,883,244

Table 8. Net premiums, claims and expenses comparison - Life

**Premiums, claims and expenses by line of business - Life**

in Thousand HUF	Premiums written - Net 2022	Premiums earned - Net 2022	Claims incurred - Net 2022	Changes in other technical provisions - Net 2022	Expenses incurred - Net 2022
Health insurance	686,748	703,682	279,111	-	3,477
Insurance with profit participation	1,026,966	1,033,327	1,499,654	500,776	371,049
Index- and unit-linked insurance	27,509,748	27,509,748	19,852,613	8,081,455	5,519,964
Other life insurance products	1,929,493	1,904,844	748,885	83,963	1,118,892
<b>Total</b>	<b>31,152,955</b>	<b>31,151,601</b>	<b>22,380,263</b>	<b>8,661,890</b>	<b>7,013,381</b>

Table 9. Net premiums, claims and expenses by line of business - Life

More than 99% of the insurance activity - relates to direct gross premium written both for Life and Non-Life - acquired from territory of Hungary.

## Insurance benefits

Total gross claims incurred were 47.6 billion HUF for the financial year. Non-Life P&C claims ratio is lower by 0.3 percentage points than prior year. In case of Life major part relates to Index- and unit-linked insurance as surrenders and partial surrenders are continuously high share within the total.

in Thousand HUF	Non Life	Health	Life	Non Life	Health	Life
	2022	2022	2022	2021	2021	2021
Premiums written (gross)	56,477,752	817,717	30,723,550	49,255,622	854,530	30,915,145
Premiums earned (net)	26,051,765	703,682	30,447,919	23,123,611	742,882	30,573,780
Insurance benefits	11,859,362	274,807	30,767,346	10,294,697	286,769	2,768,283
Operating expenses	8,165,267		0	7,013,381	6,995,522	0
						6,883,244

Table 10. Gross premiums, claims and expenses by line of business - Total

## Operating expenses

Nominal expense level significantly increased due to higher inflation compared to prior year. Due to the increasing energy prices, utility costs (especially heating costs) increased significantly. Furthermore personal expenses increased as well because of the extraordinary salary increases in 2022 due to the high inflation. Besides utility costs and personal expenses, the prices of goods and other services increased as well and caused further increase in the operating expense level.

UNIQA Biztosító Zrt. closed the year with positive gross and net technical result. However, due to the extraordinary tax imposed by the Hungarian Government the 2022's profit lagged behind the prior year's financial result. In 2022, the Company was still obligated to provide better client experience and satisfying customer needs. Company continues to optimize the business models Retail, Corporate and Bankassurance via competences around the specific customer needs. Digitization and customer satisfaction will continue to be the top priority in the future.

## A.3 Investment Performance

In the following section, the investment result of UNIQA Biztosító in the reporting period is presented.



	2021	2022
<b>I. Investment property</b>	0	0
<b>II. Financial assets accounted for using the equity method</b>	0	0
<b>III. Variable-income securities</b>	<b>0</b>	<b>0</b>
1. Available for sale	0	0
2. Fair value through profit or loss	0	0
<b>IV. Fixed-income securities</b>	<b>231,759</b>	<b>1,861,394</b>
1. Available for sale	231,759	1,861,394
2. Fair value through profit or losses	0	0
<b>V. Loans and other investments</b>	<b>1,199</b>	<b>995</b>
1. Loans	1,199	995
2. Other investments	0	0
<b>VI. Derivate financial instruments (trading portfolio)</b>	<b>0</b>	<b>0</b>
<b>VII. Investment administration expenses, interest paid and other investment expenses</b>	<b>-384,622</b>	<b>-423,784</b>
<b>Total (fully consolidated figures)</b>	<b>-151,664</b>	<b>1,438,606</b>
<b>Reclassification of technical interest income</b>	<b>0</b>	<b>0</b>

Table 11. (Net) Investment income [THUF] according to local GAAP

The direct investment portfolio of UNIQA Biztosító, including shares in associated companies, current cash held in financial institutions, excluding investment of unit-linked life insurance was HUF 35,573 million (31 December 2021: HUF 39,867 million).

Net investment income was HUF 1,438 million, which compares to HUF -151.6 million loss a year earlier. Asset composition within the direct portfolio remained weighed heavily toward locally issued government bonds (73.2% of the direct investment portfolio) in line with the matching portfolio concept. 6% of the portfolio was invested in foreign issued government bonds. We invested 6% of the portfolio in corporate (mostly foreign) bonds, 2.8% in money-market funds, while 12.1% of the portfolio was cash held in financial institutions. Generated investment income derived exclusively from the fixed income portfolio; the company did not have equity, investment property or derivative financial instrument positions for investment purposes. The net investment result in 2022 - beyond coupon income - is due to the impairment recognized due to the increase in interest rates plus disposition of ownership in subsidiaries. Admin expenses slightly decreased (from HUF 385 million to 384 million).

#### Information about directly in equity reported profits and losses

UNIQA Biztosító did not have equity positions in the direct investment portfolio in the reporting period.

#### A.4 Performance of Other Activities

In 2022, there was no significant item on other income at UNIQA Biztosító Zrt.

The following material other expenses were incurred:

<b>Other expenses - HUF thousand</b>	Statutory Values 2021	Statutory Values 2022
<b>Local business tax</b>	<b>432,918</b>	<b>486,684</b>
<b>Extra profit tax</b>	-	<b>2,819,407</b>
<b>Provisions created</b>	-	<b>240,150</b>

Table 12. Other expenses

The change in the value of the local business tax is a consequence of the increase in the company's operating profit.

According to the Government Decree on extraordinary taxes published in June 2022, insurance companies are obliged to pay additional insurance tax for the period between July 1, 2022 and December 31, 2023. The value of the additional tax accounted by UNIQA Biztosító Zrt. for the 2022 business year, among other expenses, is HUF 2,819 million.

The value of other expenses was increased compared to 2021 by the creation of a provision of HUF 240 million in connection with the Company's future contingent liability arising from a current year transaction.

## **A.5 Any Other Information**

### **Employees**

In 2022 the members of the Supervisory Board received no remuneration or advances in connection with their activity; the total personnel expenditures related to the members of the Board of Directors in 2022 amounted to HUF 134.495 thousand; loans were granted in the amount of HUF 0. No pension payment obligations exist towards former members.

### **Expenses for the auditor of the financial statements**

In 2022, the Company recognised a cost of HUF 66.880 thousand for the audit of the current year's financial statements and for the inspection of the consolidation data supply to the parent company.

## B. System of Governance

### B.1 General Information on the System of Governance

According to Solvency II, insurance and reinsurance companies shall have in place an effective governance system which provides for sound and prudent management of the business and which corresponds to the nature, extent and complexity of their business activities. Such a system includes at least an adequate transparent organizational structure with a clear allocation and adequate separation of responsibilities as well as an effective system for ensuring the conveyance of information.

The aim of this chapter is to describe the organizational structure with clearly defined roles, responsibilities and tasks of the corporate bodies as well as the governance and other key functions of the UNIQA Biztosító Zrt.

The corporate bodies of UNIQA Biztosító Zrt. consist of the following:

#### B.1.1 Sole Shareholder

The Sole Shareholder acts as the supreme body of UNIQA Biztosító Zrt..

The main tasks and decisions of the Sole Shareholder are the followings in particular:

- approval of the financial report, decision regarding the appropriation of taxed profits;
- decision on the change of the corporate form;
- appointment and removal of Management Board members, procurers;
- appointment and removal of Supervisory Board members;
- appointment and removal of Audit Committee members;
- appointment and removal of the Statutory Auditor;
- decision on the amendment of the Statutes;
- decision on other matters which fall into exclusive competence of the sole shareholder in accordance with the law or the Statutes.

#### B.1.2 Supervisory Board

The Supervisory Board controls the Management Board to ensure that the Management Board and the middle management implement proper measures to create a sustainable company value. The Supervisory Board meets as necessary, but at least once every quarter of the calendar year.

The main tasks and decisions of the Supervisory Board are the followings in particular:

- Supervision of the management in order to protect the interests of the company;
- Assessment of all motions brought before the Sole Shareholder, and presenting its opinion thereof;
- Written report on financial report with the auditor's report prior to the Sole Shareholder;
- Ascertaining that the insurance or reinsurance company has a comprehensive control system in place affording suitable facilities for effective operation;
- Supervision of the activities of the person performing the internal control function.

### B.1.3 Audit Committee

The Audit Committee assists the Supervisory Board to exercise proper control of the financial reporting system, makes a recommendation concerning the election of the Auditor and assists in the cooperation with the auditor. The Audit Committee meets at least once a year.

The main tasks and scope of the Audit Committee are the followings in particular:

- The tasks of the audit committee according to the Civil Code Section 3:291 and Act on Insurance Business Section 116 subsection 7:
  - Reviewing the efficiency of the internal audit, risk management systems and the financial reporting process and in case it is needed, it proposes recommendations;
  - Monitoring the annual and consolidated financial report prepared according to the legal regulations;
  - Reviewing and monitoring compliance with the regulations on independence on the part of the auditor person or company;
- Giving opinion on the financial report prepared according to the Act C of 2000 on Accounting (Accounting Act);
- Making recommendation concerning the person and remuneration of the auditor;
- Preparation of the contract to be concluded with the auditor.

### B.1.4 Management Board and Committees

The Management Board runs the company's business on its own responsibility in proper and accurate way. The Management Board is responsible for all matters which are not assigned to the Sole Shareholder, the Supervisory Board or the Audit Committee. The Management Board meets at least once per quarter.

The Management Board of UNIQA Biztosító Zrt. regulates the goals and strategies. Particularly it is responsible for the implementation, development and supervision of the governance system. It defines the risk strategy, the organisation of set-up and structure and provides a robust internal monitoring and control system.

#### Management Board structure

- CEO (Chief Executive Officer)
- Director of Retail Insurance
- Director of Corporate Insurance
- CFRO (Chief Finance and Risk Officer)

The allocation of responsibilities of the Management Board of the UNIQA Biztosító Zrt. are illustrated below:

CEO	Directorate of Retail Insurances	Directorate of Corporate Insurances	CFRO
Legal	Retail Product Management	Corporate Personal Insurances	Risk Management*
HR and Brand	Exclusive Sales	Corporate Non-life Insurances	Performance Management
Transformation and Client management	Partner Sales	Corporate Business Development	Finance and Accounting
Bankassurance	Direct Sales	Tender and Key brokers	Actuaries*
IT			Asset Management
Operations			Facility Management
Internal Audit*			Procurement
			Compliance**

Figure 4. Allocation of responsibilities of the Management Board

\* The internal control functions are independent of any activity and line of business, which shall be controlled/supervised by them. In case of the Risk Manager, the Chief Actuary and the Compliance Officer the employer's rights shall be exercised by the Management Board, rights related to organising work have been delegated to the responsible board members. In case of the Internal Auditor the employer's rights shall be exercised by the CEO.

\*\* Certain 2nd line of defense functions (Compliance, Financial Compliance and Data Protection) were united in Compliance department in order to strengthen the compliance functions and to make more efficient of the operation. These Compliance functions are independent in their work, and they are obliged to report regularly to the Management Board, Audit Committee, Supervisory Committee, Group functions, among others.

#### Committee structure of UNIQA Biztosító Zrt.

In order to support the work of the Management Board and the operation of the company, numerous separate committees have been developed to cover the core topics of UNIQA Biztosító Zrt.:

- Product Portfolio Committee;
- Risk Management Committee.
- Data Protection Committee;
- Committee for Conflict of Interest;
- Information Security Management Forum (IBMF);
- Asset Liability Management Committee (ALCO);
- Operation Committee (Organization of Business Continuity);
- Organization of Crisis Management;
- Outsourcing Supervisory Committee; and
- Reserve Committee.

The figure below provides an overview of the characteristics of these committees:

<b>Committee</b>	<b>Responsibility</b>
<b>Product Portfolio Committee</b>	The Product Portfolio Committee is a regular forum, where the sales and insurance technical departments are equally represented. The Committee monitors the life cycle of the products from the beginning to the point of abandoning of the products and it draws up measures in order to achieve its strategic objectives. The Product Portfolio Committee regulates and monitors the product development processes and it has a supporting role in decision making.
<b>Risk Management Committee</b>	The Risk Management Committee prepares recommendations for the Management Board as an independent control function and it supports the work of the Risk Management.
<b>Data Protection Committee</b>	The aim of the Data Protection Committee is having an efficient personal data management in accordance with the legal requirements.
<b>Committee for Conflict of Interest</b>	The aim of the Committee is to review at least yearly the Conflict of interest policy regarding the investment based insurance products.
<b>Information Security Management Forum (IBMF)</b>	The aim is the information security control within the Company, and on the Forum the Report is presented to the participants by IT Security Officer and the Director of IT and Operations about the Security Report regarding the evaluation of the past period, furthermore it contains proposals for the improvement of the information security management.
<b>Asset Liability Management Committee (ALCO)</b>	During its investment and reserving activities, UNIQA Biztosító Zrt. acts in such a way as to fulfill its undertaken liabilities at all times. UNIQA Biztosító Zrt. is committed as a priority to adequate ALM strategy. The members of ALCO shall ensure the recognised and distinct reserves and the cover statements for them in monthly reports.
<b>Operation Committee (Organization of Business Continuity)</b>	UNIQA Biztosító Zrt. operates the Operation Committee as part of the business continuity framesystem (BCP) and the disaster response (DRP). The scope of the Operation Committee is the announcement of disaster situation within the company and the decision-making in relation to dealing with and to prevent disaster situations and also the management of insurance emergency situations - as described in the Act on Insurance Business section 320.
<b>Organization of Crisis Management</b>	UNIQA Biztosító Zrt. - in case of company crisis caused by external factors, which presents high risk to the employees and the tangible and intangible property of the Company - may operate a Crisis management team. The Management Board defines the composition of the crisis management team depending on the severity of the case.
<b>Outsourcing Supervisory Committee</b>	The operation of such Committee is a must in case there is a contractual relationship between UNIQA Biztosító Zrt. and an outsourcing service provider company for critical or essential outsourcing activity where any executive officer or their close relative is the chief executive officer according to the Act on Insurance Business Section 50. The aim of the committee is to provide evaluation and control continuously at highest level primarily focusing on the conformity of the outsourced activities (service providing), efficiency of the outsourced activity and evaluation of the strategic performance.
<b>Reserve Committee</b>	The aim of Reserve Committee is to monitor the Solvency I and IFRS reserves.

Figure 5. Overview of committees

### B.1.5 Key Functions

The following shows the tasks and organisational integration of the four mandatory key functions required by Solvency II:

- Actuarial Function
- Risk Management Function
- Compliance Function
- Internal Audit Function

Each of the key functions generates regular reports which are presented to the Management Board and /or the Audit Committee and/or the Supervisory Board. The reported information is used in the monitoring and decision-making process.

UNIQA Biztosító Zrt. has also defined the following departments as key functions: Accounting, Product Development, Underwriting, Claim Management, Insurance Fee Recovery/Payment, Own Risk Assessment and Solvency Assessment, Data Storage, Continuous Daily System Maintenance and Support (IT), Administration of Insurance Contracts and Asset Management.

**Actuarial function**

The Actuarial Function is provided by the Actuarial Department which department is headed by the Director of Actuaries who is responsible for and coordinates the tasks of the Department and is the Chief Actuary as well (Director of Actuaries). The holder of employer's right is the Management Board that delegated the rights of work organisation to the CFRO and the department belongs to CFRO in the organisation structure.

The Director of Actuaries may report directly to the Management Board according to the management system the Actuarial Function is independent from any other governance and key functions. The involvement of the Actuarial Function in the work of the different committees (Risk Committee) provides opportunity for him/her to receive information from and to inform directly the Management Board.

In order to the proper separation of the lines of defence, the actuaries who undertake the tasks of pricing – as part of the actuary department – has direct reporting opportunity according to the management system to the appropriate member of the Management Board

The Actuarial Function supports Risk Management in the Solvency Capital Requirement (SCR)-calculations and provides the Technical Provision calculations (maintains methodologies, processes and models and carries out the calculations). Within the guidelines of the actuarial function, it is set that conflicts of interest resulting from new tasks under Solvency II are to be avoided. The table below summarizes the tasks of the actuarial function:

### Actuarial function

- 
- Coordination of the technical provision calculation for the solvency balance sheet;
- 
- Determination of the calculation process and development of fundamental methods;
- 
- Coordination of the embedded value calculations;
- 
- Assessment of the underwriting policy and reinsurance agreement;
- 
- Validation of models, assumptions, data and results of calculations;
- 
- Support of risk management;
- 
- Preparation of actuarial reports, especially of the annual report of the actuarial function;
- 
- Coordination of the technical provision calculation and information for the Management Board about the reliability and appropriateness of technical provision calculation;
- 
- Providing the appropriateness of the applied methodology and the underlying models, and the assumptions observed in the technical provision calculation;
- 
- Assessment of the sufficiency and quality of data used for technical provision calculation;
- 
- Comparison of best estimate and data of experience; and
- 
- Distribution of return on investment in Life business.
- 

Figure 6. Actuarial Function

### Risk Management Function

The Risk Management function of UNIQA Biztosító Zrt. reports directly to the Management Board, it is supervised by the Management Board. Regarding the Director of Risk Management, the holder of the employer's right is the Management Board that delegated the rights of work organisation to the CFRO. The Risk Management function is, within UNIQA Biztosító Zrt., independent of further governance and key functions.

The Risk Management function is responsible for the efficient implementation of the risk management system and the monitoring thereof. The processes and models of risk management in UNIQA Biztosító Zrt. are carried out in line with UNIQA Group standards. A close cooperation with the actuarial function is decisive for fulfilling the main tasks. In the context of the partial internal model, the risk management function has additional tasks.

The main tasks of the risk management function are specified below:



### **Risk Management function**

- Execution, maintenance and coordination of the risk management at UNIQA Biztosító Zrt.;
- Execution of UNIQA Group's risk management regulations and guidelines at UNIQA Biztosító Zrt.;
- Specification of and continuous follow-up on UNIQA Biztosító Zrt's risk exposure and risk profile;
- Execution, maintenance and development of the limit system;
- Identification, follow-up and reporting the risks;
- Make risk calculations:
  - o SCR;
  - o ECR;
- Administration and development of risk models:
  - o Partial Internal Model for NL insurance business;
- Supporting the activity of asset-liability management;
- Operating the own risk and solvency-assessment system;
- Reporting:
  - o Supplying of concerning data to Supervisory Authority;
  - o SFCR Report;
  - o RSR Report;
  - o ORSA Report;
- Preparation to the Risk Committee meetings;
- Communication to the affected parties (eg. Supervisory auditors, external auditors).

Figure 7. Risk Management Function

In addition to the above-mentioned, the Director of Risk Management has the responsibility of all tasks regarding the IT and physical security department.

### **Compliance function**

UNIQA Biztosító Zrt. established a Compliance Function as part of the second defense line to identify and to manage compliance risks. The Compliance Function is performed by the Compliance department (hereafter: Compliance). Compliance is headed by the Compliance Manager who is also the Compliance Officer as defined in Bit.

The Compliance Manager is responsible to fulfill the tasks defined in the Compliance Policy and Standard and in the Compliance plan.

The Compliance Manager performs all tasks related to a designated person deriving from Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (hereafter: Pmt.) and Act LII of 2017 on the execution of financial and material restrictive measures imposed by the European Union and the United Nations' Security Council (Kit.).

Employees of Compliance act independently in the performance of their duties and may only be instructed by the Compliance Manager in connection with their work.

In case of the Compliance Manager, the holder of the employer's right is the Management Board that delegated the rights of work organisation to the CFRO. Compliance is required to report regularly to

the Management Board, the Audit Committee, the Supervisory Board, Group Compliance and /or the Group Data Protection Officer and the Risk Management Committee on its activities and compliance risks. It is also entitled to report on an ad-hoc basis to the member of the Management Board affected by the compliance risk.

Compliance features:

1. general compliance
2. other financial adequacy (prevention of money laundering, financial sanctions, FATCA, CRS compliance)
3. managing the structure of the internal regulations and the related processes as defined in the Rules of Policy Management.

The Data Protection Officer is organisationally part of Compliance, but performs his or her duties independently, in which case the Compliance Manager shall exercise only the rights relating to organization of work.

Main fields of activity of the Compliance Function are the following:

## Compliance function

### General Compliance

- Performing regulatory tasks related to Compliance.
- Monitoring changes in insurance laws and other regulations (eg supervisory regulatory tools) and parent company compliance regulations. In the event of a change in the regulatory environment, initiating the review of internal processes and regulations and amending them as necessary, informing the relevant fields.
- Examination of compliance with Compliance rules.
- According to the annual compliance plan:
  - it performs risk analyses,
  - monitors compliance with the regulatory environment,
  - evaluates the measures taken with regard to identified compliance risks,
  - examines whether internal regulations comply with the regulatory environment,
  - organises trainings concerning compliance relevant topics.
- Examining the conflict of interest statement of senior executives to prevent conflicts of interest. Management and registration of conflicts of interest, making proposals for resolving the identified conflicts of interest.
- Management of the whistleblowing system, examining the reported cases.
- It provides advice about compliance risks.
- It maintains records specified in the Compliance Standard (declarations of conflicts of interest, gifts and invitations above a predetermined threshold).

### Other Financial Compliance

- AML regulations, monitoring of it, data processing.
- FATCA, CRS

### Data Protection Officer

- Regarding personal data, responsible for the tasks defined in the legislation and the Data Protection Policy.

Figure 8. Compliance Function

## Internal audit

The internal audit function is carried out by the Internal Audit department of the UNIQA Biztosító Zrt. which is headed and organized by the Director of Internal audit, who is also the chief internal auditor as defined by Bit. and is directly subordinated to the Supervisory Board of the UNIQA Biztosító Zrt. The holder of the employer's right is directly the chief executive officer.

It is an exclusive function and cannot be conducted together with other non-audit functions. This guarantees their independence and therefore warrants efficient supervision and evaluation of the efficiency of the internal control system and other components of the governance system. The tasks of the internal audit are summarized below:

### Internal Audit function

- Overall responsibility for audit activities within the companies of the UNIQA Biztosító Zrt.;
- Creation of a risk based multi-year audit plan for the UNIQA Biztosító Zrt. and obtainment of authorization – if necessary – of the Supervisory Board when substantial changes to the audit plan occur;
- Conducting of planned and special audits within the Company and the subsidiaries of UNIQA Biztosító Zrt. and regarding the outsourced activities;
- Initiation of special audits in case of imminent danger;
- Annual and quarterly reporting of the audit plan fulfilment which is presented to the Supervisory Board and Audit Committee in accordance with the periodicity required;
- Securing of the audit reporting required by law;
- Verifying the effectiveness of internal policies of UNIQA Biztosító Zrt. and the efficiency of its internal processes;
- Verifying the activity of UNIQA Biztosító Zrt. In respect of legality, security, transparency and prudential requirements;
- Audit of the correctness and completeness of regular and ad-hoc data supply to the Supervisory Authority;
- Interface between the UNIQA Biztosító Zrt. and Supervisory Authority;
- Regular reporting the planned and ad-hoc audits to the Management Board, Audit Committee and the Supervisory Board.

Figure 9. Internal Audit Function

#### B.1.6 Remuneration

The remuneration policy of UNIQA Biztosító aims to achieve a balance between market trends, statutory requirements, shareholders' expectations and the needs of employees.

#### The basic principles of UNIQA's remuneration practice are:

**Internal fairness:** fair treatment of individuals within the unit/organisation with regard to their work and individual characteristics (experience, knowledge, performance, talent and potential)

**External competitiveness:** positioning parts of the remuneration package in the desired market position to attract, motivate and retain skilled resources; defining competitive salary ranges and monitoring market trends and salary levels by participating in remuneration surveys conducted by independent salary benchmarking providers

**Preventing excessive risk-taking:** adapting the size and structure of remuneration packages and remuneration instruments to the type of risks inherent in the job, taking into account the latest legislative requirements.

**Financial sustainability:** compliance with the approved staff budget and monitoring the impact of staff costs on the balance sheet and profit and loss account in the short and long term.

UNIQA strives to ensure that its remuneration rules promote the appropriate and effective management of sustainability risks, in such a way that the structure of remuneration does not encourage excessive risk-taking with respect to sustainability risks

In this context, UNIQA does not apply remuneration principles that are inconsistent with the integration of sustainability risks into investment decision-making processes and does not include factors that would lead to conflicts of interest with respect to sustainability risks in the design of its remuneration rules.

A key consideration in the design and review of remuneration packages is alignment with UNIQA's business strategy, short-term objectives and long-term strategic plans. The performance of individuals, teams, groups and organisations and their contribution to UNIQA's success will be rewarded through performance-based components of the remuneration package.

The Board of Directors decides on the remuneration system and the individual remuneration package for each employee, taking into account local legal regulations and the UNIQA Group Remuneration Guidelines and Regulations.

Remuneration and its individual elements are based on market reference levels and UNIQA's business results and remuneration strategy.

**The subjects of the Remuneration Policy are:**

- Board members,
- Persons with key responsibilities,
- Managers designated in the Corporate Governance and Organisational and Operational Rules and Team Leaders,
- as well as Employees.

**General elements and principles of remuneration:**

***Fixed remuneration***

The basic salary is a fixed element of remuneration, which is determined for employees on the basis of their responsibilities, the complexity of their tasks and their position in the hierarchy, as well as individual qualities such as experience, skills, talent and potential.

The fixed component of remuneration is a significant part of the remuneration package, to ensure that individual employees are not overly dependent on variable elements of remuneration and to limit and/or avoid excessive risk-taking.

In addition to the basic salary, individual employees may also receive fixed allowances and benefits in accordance with local rules and conditions.

***Variable remuneration***

*Principles of variable pay*

In addition to fixed elements of remuneration, UNIQA also promises employees variable elements of remuneration depending on performance.

The total amount of variable remuneration is based on an assessment of individual and company performance. Accordingly, UNIQA aims to link remuneration directly to economic objectives and business performance. Individual performance is assessed on the basis of financial and non-financial criteria.

The elements of variable remuneration are designed to encourage performance. However, the system should not encourage risk-taking that would be incompatible with UNIQA's risk profile and/or strategy.

The weighting of the variable remuneration elements depends on the length of service required and the position.

Variable remuneration elements can be linked to different time horizons. The annual bonus is a short-term incentive (STI) that measures performance over a one-year period.

UNIQA considers both financial and non-financial criteria when assessing variable remuneration.

#### **Other variable remuneration elements**

- Various performance- and results-related pay - e.g. sales bonus scheme for salaried sales staff
- Commission - sales-related payment

#### **Extraordinary and one-off payments**

Extraordinary and one-off payments are made, for example, on the hiring, buy-out, retention or other special occasions of an employee, and on termination of employment, when justified by business needs and/or market conditions

## **B.2 Fit and Proper Requirements**

The aim of applying rules concerning fitness and propriety is to ensure that the members of the Supervisory Board and the Management Board (senior executives), the non-management officers, the key function holders and their deputies appointed by the Management Board, as well as those employees who exercise work organizational rights in relation to key function holders are sufficiently qualified and reliable for the tasks entrusted to them.

### **B.2.1 Supervisory Board and Management Board**

#### **Corporate fitness requirements**

Members of the Supervisory and Management Board are required to collectively possess at least qualification, experience, and knowledge about the following fields of competence:

- insurance and financial markets;
- business strategy and business model;
- system of governance;
- financial and actuarial analysis;
- regulatory framework and requirements.

Collective “fitness” means that members of the Supervisory and Management Board are not each expected to possess expert knowledge, competence and experience within all of those areas but the Supervisory and the Management Board as a whole has to possess the collective knowledge, competence and experience in order to provide for a sound and prudent management.

#### **Fitness requirements of members**

Fitness requirements for members of the Supervisory Board and the Management Board are the following:

- management experience and

- university-level degree and
- that they are not in the employ of an insurance or reinsurance company in the capacity of auditor.

In addition to the above, UNIQA Insurance Group AG requires the candidate to satisfy at least the following conditions:

- Degree in a relevant subject (business management, legal or natural science degree), and/or completed external or internal professional training or corresponding education and/or;
- Adequate professional experience, particularly executive experience as a manager or an expert at least three years at UNIQA or in a company with similar size and/or line of business.

### **Assessment of fitness**

The general evaluation of the candidate will be carried out first, followed by a specific examination with regard to the specifics of the institution and the function to be performed.

The assessment of the person's fitness should consider both the theoretical experience obtained through education and training and the practical experience gained from previous positions.

When assessing the theoretical experience, particular consideration should be given to the level and profile of the education and whether it relates to the areas of insurance, finance, economics, law, administration, etc.

Beyond the mandatory provisions laid down in the Act LXXXVIII of 2014 on the Business of Insurance (Bit.), practical and professional experience gained from previous positions should be assessed, with particular regard to

- length of service,
- nature and complexity of the business in which the position was held, including its organizational structure,
- scope of competencies, decision making powers and responsibilities,
- professional knowledge gained through the position about the line of business and its risks,
- number of subordinates.

In the case of members of the Supervisory Board and the Management Board, other aspects of the assessment of professional fitness include the assessment of independent thinking and the assessment of time available for the performance of the given function.

### **Propriety requirements of members and their assessment**

Regarding propriety – beyond having no prior criminal record and beyond the obligatory provisions of Bit. – every conviction or condemnatory decision of a court, authority and professional chamber should be taken into consideration. In case of infringements that do not exclude the propriety of a person by the operation of law, the assessment should be done on a case-by-case basis. Consideration needs to be given to the severity and the type of the infringement, the level of appeal (definitive vs. non-definitive convictions), the lapse of time, as well as the person's subsequent conduct. The assessment is based on the excerpt from criminal record, the declaration of the applicant and on publicly available

data. It is also important to pay attention to any existing or potential conflict of interests, as well as to circumstances that give rise to a reasonable doubt about the persons' honesty, reputation, integrity, character, personal behaviour, and financial soundness.

### **B.2.2 Non-management Officers According to Bit. and the Key Function Holders**

UNIQA Biztosító Zrt. operates the following key functions:

Governance functions:

- Risk Management Function;
- Internal Audit Function;
- Compliance Function;
- Actuarial Function;

Other key functions:

- Accounting;
- Product Development;
- Underwriting;
- Claims Handling;
- Insurance Premium Collection / Disbursement;
- Own Risk and Solvency Assessment;
- Data Storage;
- Continuous, Daily System Maintenance and Support (IT);
- Administration of Insurance Contracts;
- Asset Management.

### **Fitness requirements**

When assessing the fitness of non-management officers, key function holders and their deputies appointed by the Management Board, as well as those employees who exercise work organizational rights in relation to key function holders UNIQA Biztosító Zrt. extends the scope of requirements beyond what is laid down in mandatory legal provisions and regulatory requirements in terms of qualification, educational degree and other requirements if it is required by UNIQA Insurance Group AG.

The persons responsible for other key functions must have a university-level degree in the relevant field – such as in particular in the field of natural sciences, social sciences, economics, law, or engineering – or must have at least two years of relevant experience. The end of professional experience must be within ten years of the date of the beginning of employment.

Special rules apply to the fitness requirements of the person responsible for the asset management function.

### **Assessment of fitness**

Criteria taken into account at the assessment are identical with those applied in the case of senior executives.



**Propriety requirements and their assessment**

Criteria and their assessment are identical with those applied in the case of senior executives.

**B.2.3 Process of Fit and Proper Assessment**

The assessment of fitness and propriety is implemented in the external and internal recruitment process.

Collecting the documentation required for the decision on fitness and propriety of members of the Supervisory and the Management Board is the task of Group HR in close cooperation with the General Secretary.

As a result of prior assessment by Group HR a proposal regarding the fitness and propriety of the relevant person is submitted to the person/body responsible for the assessment. As regards the members of the Supervisory Board and the Management Board it is the Board of UNIQA Österreich Versicherungen AG that is responsible for the assessment and the final decision.

Collecting the documentation which is required for the decision on fitness and propriety of non-management officers, key function holders and their deputies appointed by the Management Board, as well as those employees who exercise work organizational rights in relation to key function holders is the task of the HR Department of UNIQA Biztosító Zrt.

The HR Department submits a proposal regarding the fitness and propriety of the relevant person to the respective member of the Management Board who is responsible for the assessment and the final decision.

**Re-assessment**

Regular re-assessments of fitness and propriety are carried out every two years under a simplified procedure.

Members of the Supervisory and Management Board, non-management officers, key function holders and their deputies appointed by the Management Board, as well as those employees who exercise work organizational rights in relation to key function holders are obliged to notify the body/person responsible for Fit and Proper assessment about any essential changes to the documentation, declarations and other information or data provided by them in the course of the assessment procedure.

The body/person responsible for Fit and Proper assessment considers and decides whether an extraordinary re-assessment is required based on the changes. In the cases indicated in the internal regulation on fitness and propriety a re-assessment must be performed.

**Ensuring continuous compliance**

Persons subject to fit and proper rules are obliged to continue and update their education and knowledge relevant for their position.

Trainings attended by persons subject to fit and proper assessment have to be documented in their personal file. Moreover, these persons have a duty to report changes in respect to the facts and data that form the basis of their fitness and propriety.

Based on the report about changes, the body/person responsible for the assessment might initiate an extraordinary re-assessment or take other appropriate measures.

## **B.3 Risk Management System Including the Own Risk and Solvency Assessment**

### **B.3.1 General Information**

The risk management system, as part of the governance system, serves the identification, the valuation and the surveillance of short and long-term risks which UNIQA Biztosító Zrt. is exposed to. The internal guidelines in line with UNIQA Group uniform standards include a detailed description of the organisational and process structure.

### **B.3.2 Risk Management, Governance and Organisational Structure**

The organisational structure of the risk management system reflects the concept of the “three lines of defence”. It is precisely defined in the following sections.

#### **First line of defence: Risk management within the business activities**

The persons responsible for the business activities are responsible for establishing and operating an appropriate system of internal controls in the areas and processes for which they are responsible, while identifying and monitoring the risks associated with the business processes.

#### **Second line of defence: Supervisory functions, including the risk management function**

The risk management area and the control functions are required to monitor the business without interfering with business decisions.

#### **Third line of defence: Internal and external examination**

Internal and external audits provide independent assurance on the design and effectiveness of the internal control system, including Risk Management and Compliance.

The organisational structure of the risk management system and the most significant responsibilities within UNIQA Biztosító Zrt. are depicted below:

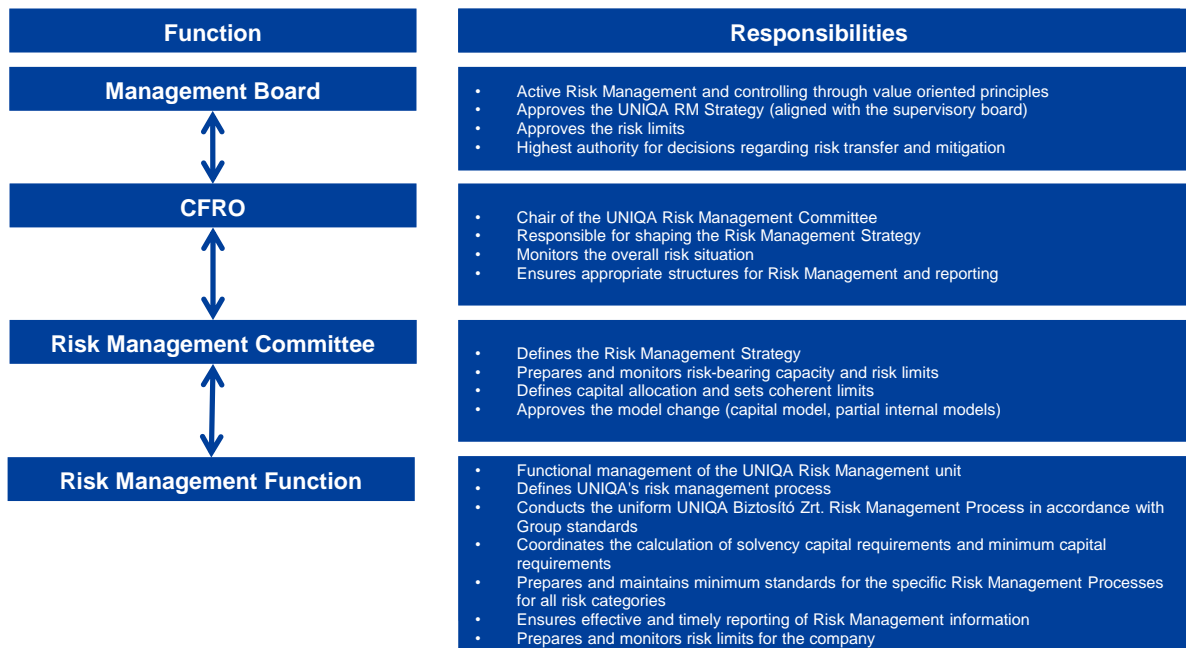


Figure 10. Organisational structure of the risk management system

### Management Board functions

The Management Board of UNIQA Biztosító Zrt. is responsible for establishing the business strategy and determining the associated risk strategy. The core components of the risk management system and the associated governance are embedded in the UNIQA Biztosító Zrt. Risk Management Policy which was adopted by the Management Board.

On the level of the UNIQA Biztosító Zrt. Management Board, the function of the Chief Finance and Risk Officer (CFRO) is a separate position. This ensures that the topic of risk management is represented in the Management Board.

The risk management committee is a core component within the risk management organisation. It monitors and controls the risk profile of the UNIQA Biztosító Zrt. The aims are the control and the monitoring of the short and long-term risk profile as it is defined within the risk strategy of UNIQA Biztosító Zrt. Moreover, the committee is responsible for defining, controlling and monitoring the risk-bearing capacity and the risk limits.

### B.3.3 Risk Strategy

The risk strategy describes how the company deals with risks, which represent a potential threat for achieving strategic business goals. The main purposes are maintaining and protecting the financial stability, the reputation and the profitability of UNIQA Biztosító Zrt. in order to meet the obligations towards the clients, share- and stakeholders. Last but not least, UNIQA Biztosító Zrt.'s carefully formulated risk strategy contributes to complying with the Supervisory requirements and recommendations regarding continuous capital adequacy.

The risk strategy is prepared by the risk management function of UNIQA Biztosító Zrt. and is approved by the Management Board.

A core component of the risk strategy is the definition of the risk categories. UNIQA prefers risks which can be influenced and controlled efficiently and effectively according to a reliable model. The risk profile mainly focuses on underwriting risks. The table below provides an overview of the defined risk preferences structured by risk categories.

Risk category	Risk appetite		
	low	medium	high
Underwriting Risk Non-Life			X
Underwriting Risk Life			X
Underwriting Risk Health			X
Market Risk		X	
Credit Risk / Counterparty Default Risk		X	
Operational Risk	X		
Strategic Risk	X		
Liquidty Risk	X		
Concentration Risk	X		
Reputational Risk	X		
Emerging Risk	X		
Contagion Risk	X		

Table 13. Risk appetite

UNIQA Biztosító Zrt. defines its risk appetite on the basis of the “Solvency Capital Requirements” (SCR) but corresponds to the further development of the European Insurance and Occupational Pensions Authority (EIOPA) standard formula for the SCR. The calculation of the underwriting risks within the property and casualty insurance is performed by means of a partial internal model (PIM), which following the Regulatory approval is also used for regulatory capital requirement beginning with December 2017.

Sustainability risks or ESG risks include risks related to the sustainability factors of environment, social/employee and governance (“ESG”). In line with the Group view, these risks are not considered as a separate risk category, but are taken into account as part of the existing risk categories.

#### B.3.4 Risk Management Process

On the one hand, the risk management defines the risk categories, which are in the focus of the risk management processes. On the other hand, it provides the organisation and process structure to ensure a transparent and optimal risk management process.

The risk management process delivers information on the risk profile regularly and enables the top management to take control measures in order to achieve the long-term strategic objectives. The process focuses on company-relevant risks and is defined for the following risk categories:

- Underwriting risk (property and casualty insurance, health insurance, life insurance)
- Market risk / Asset-Liability Management (ALM) risk
- Credit risk / Default risk
- Liquidity risk
- Concentration risk

- Strategic risk
- Reputation risk
- Operational risk
- Contagion risk
- Emerging risk

For these risk categories, risks are regularly identified, evaluated and reported according to a Group-wide standardised risk management process. Guidelines, that aim to regulate the processes, are implemented for most of the risk categories mentioned above. The figure below depicts the risk management process of UNIQA Biztosító:



Figure 11. Risk management process

### **Risk and context identification**

The risk identification is the starting point for the risk management process. All significant risks are recorded systematically and described as detailed as possible. In order to process a risk identification as complete as possible, different approaches are used simultaneously. In addition, all risk categories, departments, processes and systems are taken into account.

### **Risk assessment**

The risk categories of market risk, underwriting risk, counterparty default risk and concentration risk are evaluated by means of quantitative methods based on the Solvency II requirements<sup>1</sup> for the SCR and the ECM (Economic Capital Model) approach. For the results of the standard approach, risk drivers are identified and analysed in order to assess whether the risk situation is reflected adequately (in accordance with the ORSA process). All other risk categories are evaluated quantitatively or qualitatively using proper risk scenarios.

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<sup>1</sup> Commission Delegated Regulation (EU) 2015/35 of 10 October 2014 supplementing Directive 2009/138/EC of the European Parliament and of the Council on the taking-up and pursuit of the business of Insurance and Reinsurance (Solvency II)

## Targets and limits

Within the limit and early warning system, the risk bearing capacity and the capital requirements are determined regularly based on the risk situation and thereby, the level of coverage is derived. If critical coverage thresholds are reached, a precisely defined process is set in motion, which aims to bring the level of solvency coverage back to a non-critical level.

## Monitoring and controlling

The process of monitoring and controlling of risks focuses on the continuous audit of the risk environment and the fulfilment of the risk strategies. The risk manager of UNIQA Biztosító Zrt. performs the process and is thereby supported by the Risk Management Committee.

## Reporting

As a result of the risk analysis and monitoring, a risk report is prepared for UNIQA Biztosító. All risk reports have the same structure and provide an overview of the main risk indicators, the risk bearing capacity, the solvency requirements and the risk profile. Furthermore, a reporting form is available to provide a monthly update regarding the major risks of UNIQA Biztosító Zrt.

Besides the evaluation according to Solvency II, operational and other significant risks are evaluated regularly by means of expert assessments. The quantitative and qualitative risk evaluations are consolidated in a risk report and are placed at the disposal of the management.

### B.3.5 Committees Relevant to Risks

An overview of the committees has already been presented in chapter B.1.4. In particular, the Risk Management Committee represents a key element within the risk management organisation. This committee is responsible for the control of the risk profile and the related definition and monitoring of the risk bearing capacity and risk limits.

### B.3.6 Governance of the Partial Internal Model

The partial internal model is subject to UNIQA Group Model Governance policy and the related standards that, both at the Group and the local level, set out the governance requirement for the partial internal model. In particular, the model governance framework covers the following areas:

- Roles and responsibilities
- Internal Control System for the partial internal model
- Model validation
- Model change process
- Data quality
- Expert judgement

## Roles and responsibilities

Roles and responsibilities regarding the partial internal model are the following:

### Managing Board

- Approves the application to the supervisory authorities for approval of the internal model, as well as the application for approval of any subsequent major changes made to that model

- Responsible for putting in place systems which ensure that the internal model operates properly on a continuous basis
- Uses the results of PIM for steering the strategy of the company

Board Member responsible for risk management and finance

- Approval or rejection of the model and its results based on the outcome of the validation
- Approval of new assumptions that cause a major model change
- Approval of the application to the supervisory authorities for an approval of a major model change

Risk Management Committee

- Regular discussion of the model results and of the results of model validation
- Internal approval of major model changes
- Delegation of specific partial internal model related tasks to expert sub-committees, as described below

Internal Model Subcommittee

- Ongoing discussion of the partial internal model at a technical level
- Regarding the locally owned model components, decision on model changes to be implemented and development of these changes
- Internal approval of minor model changes, notifying the Risk Management Committee
- Approval of new methodology assumptions that imply a minor model change

Validation Subcommittee

- Discussion of the validation results and decision on the validation outcome

Risk Management Function

- Local implementation of model governance standards
- Planning and coordination of the model calculation
- Definition and review of internal controls
- Preparing, maintaining and updating the model documentation
- Performing independent validation of the model including suitability assessments, preparing validation reports
- Monitoring the ongoing compliance of the model with the requirements for internal model approval
- Suggesting areas for model improvements

Actuarial Function

- Coordination of data collection for the partial internal model
- Model parameterisation, including documentation in the Parameterisation Report
- Performing meta-control tasks over the Reserve Risk parameterisation parts performed by Group Actuarial
- Preparing model inputs
- Performing dependent validation tests on the model inputs, supporting independent validation with quantitative inputs

Group Actuarial

- performs Reserve Risk parameterisation for those lines of business where the Bootstrap methodology is used

Internal Audit Function

- Independent review of model governance, use test, data quality and documentation

**Internal Control System for the partial internal model**

A comprehensive control checklist, covering every data collection and calculation step, is completed during each partial internal model calculation process. Control responsibilities ensure that the four-eyes principle is observed. In addition, internal controls apply to the model validation process.

**Model Validation**

Comprehensive requirements for the validation process are set out by the UNIQA Group Validation Standard. The following types of validation are distinguished:

- Initial validation
- Ongoing validation
- Ad-hoc validation

The initial validation of the partial internal model was performed in 2015 and it is to be repeated at regular 5-year intervals beginning from the regulatory approval of the model. Accordingly, a comprehensive re-validation took place during 2020. The scope of the initial validation or re-validation program includes the review of all sub-models and all model components: coverage and use, model structure and methodology, data, model parameterisation, computational processes and results testing, model-specific governance. The initial validation program also includes a non-model specific part, covering model governance, use test, data quality management, profit and loss attribution, calibration standards and compliance with partial internal model requirements.

An ongoing validation process is performed parallel to each annual partial internal model calculation, where a successful validation result is required for the approval of the model results. The ongoing validation program includes the following tests:

- Documentation appropriateness
- Data quality assessment
- Profit & Loss attribution
- Use test and risk mitigation
- Model Back-testing
- Model re-parameterisation including expert judgment
  - Goodness of Fit
  - Sensitivity and Stability Analysis
  - Analysis of Change
  - Model versus Plan
  - Scenario-, Stress- and Reverse-Stress-Testing
  - Diversification effects
- Parameter uncertainty
- Emerging risk assessment and model assumptions



An ad-hoc validation process is triggered by model changes, changes in the risk profile or the need for re-validation of the problem areas identified by an earlier validation process.

### **Model Change Process**

Standards for the model change process are set out in UNIQA Group Model Change Sub-Policy. Qualitative and quantitative criteria are defined for classifying a model change as either a minor or a major one (a major model change requiring regulatory approval before use). Triggers for model changes include emerging risk assessments and the weaknesses identified in the validation process. There are rules for the reporting, documentation, validation and approval of model changes. As a general rule, a model change cannot be used before it is successfully validated and approved.

### **Data Quality**

The partial internal model is subject to the UNIQA Group Data Quality Standard. Data quality requirements include the definition of data dictionaries and data flows as well as data quality assessments.

### **Expert Judgement**

Areas of expert judgement include the setting of methodology assumptions and regular expert judgement during the model parameterisation. Both are subject to UNIQA Group Expert Judgement Standard. In particular, the assumptions of the model have to be identified, documented, assessed for materiality and regularly validated.

### **B.3.7 The Company's Own Risk and Solvency Assessment**

UNIQA's Own Risk and Solvency Assessment (ORSA) process is forward-looking and is an integral part of the business strategy, the planning processes and the overall risk management concept at the same time. The results of the ORSA cover the following contents:

1. Standard formula: process, methodology, appropriateness and variations;
2. Assessment of the overall solvency needs: process, methodology, own funds (OF), economic capital requirement (ECR), stress and scenario analyses, risk mitigation, climate risk;
3. Assessment of continuous compliance of the solvency-/minimal capital requirements (SCR/MCR) and technical provisions: limit system, SCR projection, stress and scenario analyses, technical provisions
4. Conclusions and strategy review and
5. Appendix.

### **Integration of the ORSA process**

The ORSA process is of significant importance to the entire UNIQA Biztosító Zrt.. A continuous exchange occurs between the ORSA and risk management processes, which supplies ORSA with the relevant inputs. It ensures an effective and efficient management of UNIQA Biztosító Zrt.'s risks and is therefore a crucial element for the fulfilment of all regulatory capital requirements (SCR and MCR) and the complete solvency requirements (internal perspective) both at the moment and throughout the whole planning period.

The reference date for the ORSA of UNIQA Biztosító Zrt. is 31 December of the previous year. This ensures that ORSA is up to date and that the results of the strategy and planning processes as well as

the specification of the risk and strategy framework for the following year can be included. Next to the annual ORSA, unscheduled ORSA runs can also take place. For this purpose, UNIQA Biztosító Zrt. has defined various incidents which initiate the assessment process to determine whether an unscheduled ORSA is necessary. As soon as an initiating incident takes place, the Management Board of UNIQA Biztosító, is informed. The risk management department analyses, whether an unscheduled ORSA has to be performed. In form of a recommendation, the result is delivered to the Management Board, which decides, whether an unscheduled ORSA is necessary.

### **The ORSA 8-step approach**

The ORSA process of UNIQA Biztosító Zrt. is based on an 8-step approach which is executed in an integrated way between the risk management function and the Management Board. In the paragraph below, UNIQA Biztosító Zrt.'s 8-step approach is explained.

During step (1) of the UNIQA ORSA approach, the relevant risks for the ORSA process are identified and the methods and assumptions are defined. Step (2) 'Analysis of Risk Profile' covers the valuation of UNIQA risks within the ECR framework. Step (3) comprises the projection of the ECR, the SCR, the application of stress (including reverse) tests and scenario analysis. The results and the methods applied are recorded as 'ORSA results' in step (4). During step (5) 'steering/management (coordination)' the necessity for the application of risk mitigation measures is reviewed and if necessary applied, while the risk position UNIQA Biztosító Zrt. is monitored during step (6) based on a stoplight system and if necessary additional measures are applied. The final ORSA report is also created during step (7). The application of risk limits step (8) covers the limitation of risks based on individual risk categories and the allocation of own funds to the identified risks.

The ORSA 8-step approach explained above is characterised by a continuous exchange of information between the various involved parties. The Management Board of UNIQA Biztosító Zrt. carries the final responsibility of the approval of UNIQA Biztosító Zrt.'s ORSA and it discusses the methods and assumptions for the ORSA process with the risk management department. Furthermore, the Management Board is responsible for the approval of the results of the ORSA report. The participation of the Management Board of the company ensures that it is always informed about UNIQA Biztosító Zrt.'s risk positions and the Own Funds requirements resulting from it.

### **Risk identification**

The identification of risks is the basis of a complete risk management and ORSA process. This identification process covers the risk exposures with regard to all risk categories as described in Section Risk profile. The risks are identified by the appropriate risk owner. This identification is based on various expert conversations regarding the risks. Consequently, particular risk-generating processes are analysed. Risk owners are chosen on basis of the extent of their radius of operation within the organisational structure.

### **Continuous fulfilment of solvency requirements**

The overall solvency needs of UNIQA Biztosító Zrt. that are called economic capital requirement (ECR) represent the result of all capital requirements. For the particular risks, diversification effects are included according to the Solvency II standard formula for the individual risk modules and lines of businesses, for which the standard model is used. The risk evaluation occurs by means of the following methods: Solvency II standard approach, internal economic capital requirements, partial internal model or qualitative assessment of non-quantitative risks.

On the basis of projections, UNIQA Biztosító Zrt. guarantees that it continually ensures the regulatory capital requirements throughout the business planning period and beyond. This is the reason why the regulatory capital requirements SCR, the ECR and the available capital are projected over a planning period of five years. Moreover, stress tests are carried out by performing scenario and sensitivity analyses. These scenario analyses are based on possible future scenarios with a material influence on the capital and the solvency position of UNIQA Biztosító Zrt. By analysing the sensitivities, the influence on individual risk drivers is assessed by means of scenario tests. A hypothetical environment, consisting of different risk drivers, is being analysed here. Based on the available capital and the risk appetite, the overall risk budget of UNIQA Biztosító Zrt. can be determined.

## **B.4 Internal Control System**

### **B.4.1 Internal Control System**

The Internal Control System (ICS) shall ensure the insurance company's compliance with applicable laws, regulations and administrative provisions and the effectiveness and the efficiency of the company's operations in light of its objectives, as well as ensure the availability and reliability of financial and non-financial information. ICS is a framework that provides a standardized process, which guarantees that risks related to the effectiveness and efficiency of insurance activities, compliance and generation of reliable (non-) financial information will be minimized, prevented or eliminated through predefined controls and procedures. Special importance is attached to the transparent and efficient organisation of the process. Therefore, an internal control system for the reduction and avoidance of risks was implemented for all processes in which significant financial and/or operative risks as well as compliance risks can occur.

For UNIQA Biztosító Zrt. an internal guideline serves as the basis for the implementation of the internal control system. It defines the minimal requirements regarding organisation, methods and extent. The ICS guideline specifies that the internal control system has to be implemented based on an approved value chain from the Group, focusing on the processes on a higher level, with flexibility to customize to local needs. During the ICS process the local unit has to assure that all significant risks are identified based on a common risk catalogue developed by the Group. Main areas that are covered within the ICS, evaluated mainly on a qualitative basis, are: Sales, (Non-)Life Underwriting, Claims Management, Finance and Accounting, (Non-)Life Actuarial, Compliance, Legal, Risk Management, Reinsurance, Human Resources, Controlling, Customer Services, Marketing, IT & Operations, Strategy & Project Management, AML and Internal Audit. Additionally there are two main processes, IFRS and EBS, that are quantitatively evaluated.

The concept of the "Three lines of defence" is also valid for the ICS framework. There is a person in charge for each of the mentioned areas covered who is responsible for the organisation of an efficient internal control system within his or her field of responsibilities.

According to the ICS guidelines of UNIQA Biztosító Zrt., the following activities have to be carried out during the execution of the ICS process in the areas mentioned above:

- Scoping of relevant risks for the area from the common risk catalogue
- Risk and control self-assessment
- Monitoring
- Management reporting

In order to guarantee a continuous assessment of the control quality, a monitoring system for the examination of the control performance, transparency and efficiency is crucial and has to be established for every process. The assessment of these criteria should take place via standardised control assessment and has to be defined individually for each process.

The following criteria have to be taken into account:

- Design effectiveness – measures the effectiveness of the control based on the way the control is designed, i.e. expected risk mitigation effect
- Operational effectiveness – determines whether a control is effective during its operation

Each owner of the above-mentioned areas annually submits an ICS report, which includes information on the control performance, as well as residual risk assessment and planned measures. Then also an overall ICS summary for the whole company is prepared. This includes an overall assessment of the areas covered in the ICS, risks identified from the common risk catalogue, controls defined and evaluated, residual risk assessment and planned measures. The ICS summary for the company is created on an annual basis. It is brought to the attention of the CFRO and discussed within the Risk Management Committee. In order to increase the efficiency of the ICS, from 2022 the entire ICS reporting process is carried out in an IT system, supported by the Group.

#### **B.4.2 Compliance Function**

A permanent, properly functioning compliance function is installed at UNIQA Biztosító Zrt. in line with the governance principles set out by UNIQA Group and the National Bank of Hungary. Independence of the Compliance function, - from the areas it monitors and advises for- is ensured by the Organizational and Operational Rules of UNIQA Biztosító Zrt. The Board of Directors appoints the Compliance Officer. Compliance is required to report regularly to the Board of Directors, the Audit Committee, the Supervisory Board, the Group Compliance and the Risk Management Committee on its activities and compliance risks and issues.

The activities of the compliance function are performed in accordance with the Annual Activity Plan. The scope of activities of the compliance function is described in the Compliance Policy. One of the main obligations of the Compliance Function is the monitoring of the changes of legislative acts and other regulatory tools (e.g. supervisory regulatory tools) (hereinafter: regulatory environment) and accordingly the initiation of the review - and if it is necessary - the modification of internal processes and internal regulations. The Compliance Function performs compliance risk analyses, monitors compliance with the regulatory environment, evaluates the measures taken with regard to identified compliance risks, and organizes trainings concerning compliance relevant topics and maintains records specified in the Compliance Standard. The Compliance Function has to draw up and regularly update the Compliance Policy and the Compliance Standard according to the guidelines of the Group Compliance Function as well as other compliance-related internal regulations such as about policy management, conflicts of interest, evaluation of fitness and propriety, code of conduct etc.

The Compliance Function is entitled to have access to all data and documents that are necessary to perform its tasks.

Compliance risks are owned by business departments, while Compliance, as the second line of defence function is accountable for supporting the business and monitoring these risks through preventive advice and control related activities.

## B.5 Internal Audit Function

“Internal Audit” function is one of the key functions under Solvency II framework Directive. In order to comply with the regulations, a separate department has been created for the Internal Audit function at UNIQA Biztosító Zrt. Internal Audit is directly subordinated to the Supervisory Board of UNIQA Biztosító Zrt. and the Chief Executive Officer of UNIQA Biztosító Zrt. exercises the employer’s rights over Internal Audit.

### Responsibilities of the Internal Audit function:

- audit of the insurance activities of UNIQA Biztosító Zrt. from a regulatory, security, transparency and efficiency (prudential) point of view
- audit of internal processes of UNIQA Biztosító Zrt. with respect to the effectiveness of related internal policies
- checking the quality (accuracy) and completeness of the Regulatory data reports submitted to the Authority at least quarterly
- providing independent and objective auditing and consultancy services, in order to improve business processes and enhance business value
- preparation of audit reports and submission at least the summary of reports to the supervisory and management board

### Main tasks of the Internal Audit function:

- auditing of UNIQA Biztosító Zrt. and its subsidiaries
- execution of planned and ad-hoc audits
- in case of immediate risk situations performs special investigation, which is approved by the Supervisory Board
- preparation of quarterly reports on the fulfilment of internal audit plan
- regular submitting and reporting of internal audit results to the Management Board, Audit Committee, and Supervisory Board of UNIQA Biztosító Zrt. and to the heads of the audited departments
- preparation of annual report on the fulfilment of internal audit plan, submission of the report to the Supervisory Board
- monthly follow-up of the execution of audit findings
- performing internal audits required by the regulations
- audit of the proper operation and effectiveness of the internal policies of UNIQA Biztosító Zrt.
- checking the quality (accuracy) and completeness of the Regulatory data reports of UNIQA Biztosító Zrt. submitted to the Authority
- operating as a single point of contact between the Supervisory Authority (National Bank of Hungary), and UNIQA Biztosító Zrt.

### Organization

Internal audit function is performed by the Internal Audit Directorate at UNIQA Biztosító Zrt. The unit is managed and organized by the Internal Audit Director, who at the same time performs all tasks required by the Insurance Act.

Internal Audit is an exclusive function that cannot be performed together with other non-audit tasks. It guarantees the independence of Internal Audit and ensures the effective supervision and evaluation of the internal control system and the other management systems within UNIQA Biztosító Zrt.

In order to be able to fulfil the audit function, internal auditors are authorised to review all documents and data and to receive all necessary information that are needed to fulfill their audit assignments. Every employee of UNIQA Biztosító Zrt. and its subsidiaries, including the contractual partners of outsourced activities, is obliged to ensure the availability of all required documents and data without any delay and to give all information internal auditors need. Access to all rooms of UNIQA Biztosító Zrt. must be granted without any exception.

## **B.6 Actuarial Function**

Within UNIQA Biztosító Zrt., the Actuarial Function is held by the head of Actuarial Department. The tasks of the Actuarial Function have already been described in chapter B.1.5. Key Functions.

The director of the unit Actuarial Department, the Chief Actuary is defined as a key function within UNIQA Biztosító Zrt. and has to fulfil the Fit & Proper requirements as described in section B.2.2.

Within the annual Actuarial Function Report, the Actuarial Function reports to the Management Board. The report contains all activities completed within the reporting period, as well as their results. Here, especially optimisation potentials are highlighted and recommendations for actions are made in order to improve them, together with a follow-up on last year's recommendations. The report follows precisely defined structure specifications.

## **B.7 Outsourcing**

The Outsourcing Policy of UNIQA Biztosító Zrt. provides for detailed rules regarding the types of outsourcing, as well as the entire process, the control and supervision and the termination of outsourcing.

Outsourcing of activities to legal entities in which UNIQA Insurance Group AG has at least a share (and/or voting rights) of 50% directly or indirectly, is defined as intragroup type of outsourcing, whereas outsourcing towards legal entities where UNIQA Insurance Group AG has less than the previously mentioned shares (and/or voting rights), belong to the category of external outsourcing. It is important to highlight that key functions are not allowed to be outsourced externally in their entirety.

An outsourcing agreement is defined as Group outsourcing if more than one legal entity of the UNIQA Group outsources the same business processes to one internal or external service provider.

The Outsourcing Policy defines also those functions and activities which are considered to be key.

As far as the process of outsourcing is concerned, detailed rules have been laid down regarding the criteria for choosing the eligible service provider. The Procurement Policy and the Outsourcing Policy specifies those organisational units that participate in the election of the service provider and in preparation of the outsourcing agreement. It also names the cases that require prior approval of the Management Board or Supervisory Board and contains a list of mandatory elements of the outsourcing agreement. This latter is of particular importance in order to ensure that UNIQA Biztosító Zrt. is able to meet its obligations of effective control and supervision towards the service provider and

that it is equipped with proper strategies of exiting the outsourcing arrangement in case of noncontractual delivery of services.

UNIQA Biztosító Zrt. has outsourced the following key functions and activities:

<b>Activity</b>	<b>Jurisdiction of service providers</b>	<b>Type of outsourcing</b>
Claims handling activities	Hungary	group internal
Other claims handling and claims adjustment activities related to life & non-life claims handling	Hungary	group internal
Certain activities related to asset management	Austria	group internal
Back-office, electronic data procession	Hungary	group internal
Administration, claims handling activities, customer service	Hungary	group internal
Certain IT and telecommunication activities	Austria	group internal
Certain claims handling and service organization activities related to medical care	Hungary	group external

Table 14. Outsourced activities

## **B.8 Any Other Information**

UNIQA Biztosító Zrt. places a high quality standard on the design of its governance system. In particular, strict adherence to the so-called “Three Lines of Defence” concept is crucial for a clear separation of roles and responsibilities. This is underscored by the development of a committee system by which the Board integrates the governance and key functions into the decision-making process in structured form. The governance system of the UNIQA Biztosító Zrt. is examined on an annual basis.

## C. Risk Profile

### C.1 Overview of the Risk Profile

The solvency capital requirement of UNIQA Biztosító Zrt. is calculated on the basis of the Solvency II standard formula and a partial internal model (PIM) for the calculation of the solvency capital requirement non-life integrated in into the Solvency II standard formula. The calculation approach serves the determination of the regulatory capital requirement for the company. The partial internal model covers non-life underwriting risk and health underwriting risk non-similar to life techniques. The calculation method of the partial internal model and the standard formula ensures that the capital requirement takes into account all quantifiable risks to which UNIQA Biztosító Zrt. is exposed to. An essential goal is to fully cover the existing business as well as the new business, which will be concluded within the next 12 months. New business is only considered in the non-life business line or health business line (similar to non-life). The underlying risk measure for both the partial internal model and the standard formula is 99.5 per cent VaR (Value-at-Risk) over a one-year time horizon. This means that the solvency capital requirement represents an amount of loss whose probability of occurrence over a one-year period is 1 in 200.

The solvency capital requirement is the sum of three components:

- Basic Solvency Capital Requirement (BSCR)
- Capital requirement for operational risk
- Adjustment for loss absorbency effects

The BSCR is calculated by aggregating the different risk and sub-risk modules taking into account correlation effects. Moreover adjustments for the loss-absorbing capacity of future profit sharing and deferred taxes are made. The sum of BSCR as well as capital requirements for operational risk and adjustments for future profit sharing and deferred taxes amounts to the SCR (Solvency Capital Requirement).

The following figure illustrates the composition of the corresponding risk and sub-risk modules. Each standard formula-based module is calculated by means of a scenario or a factor-based approach according to Delegated Regulation (EU) 2015/35 of the Commission<sup>2</sup>. In the partial internal model a probability distribution forecast is calculated via stochastic simulation.

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<sup>2</sup> Delegated Regulation (EU) 2015/35 of the Commission from 10 October 2014 in addition to the Directive 2009/138/ EG of the European Parliament and of the Council on the taking-up and pursuit of the business of Insurance and Reinsurance (Solvency II).



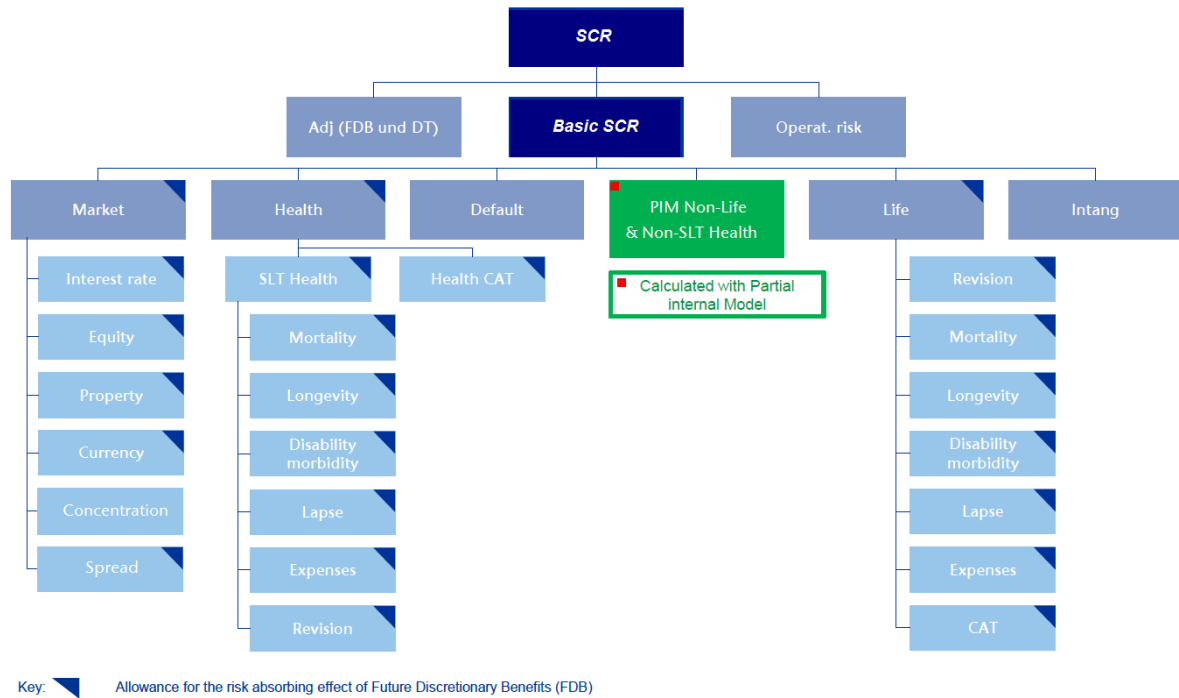


Figure 12. Risk Composition of the SCR

Table 15 illustrates the risk profile and the composition of the SCR of UNIQA Biztosító Zrt. as at 31 December 2022. The biggest risk driver of the company is non-life underwriting risk with a share of 34 per cent of the overall capital requirement (SCR). The detailed composition of the individual risk modules is described in the following sections. The solvency ratio as at 31 December 2022 is 138.9 per cent which indicates that UNIQA Biztosító Zrt. has sufficient capital to meet its risk profile according to Solvency II standards. However it is below the internally-defined target level and the Supervisor's Guideline on Volatility Capital Buffer. This is why the company started the process of preparing a remedy plan, to fulfill those two requirements as well in their capital adequacy.

Position	2022 in Thousand HUF
<b>SCR</b>	<b>16,934,247</b>
<b>Basic SCR</b>	<b>15,266,588</b>
<i>Market risk</i>	6,322,866
<i>Counterparty Default Risk</i>	2,254,838
<i>Life underwriting risk</i>	6,423,311
<i>Partial Internal Model Non-Life</i>	7,847,005
<i>Health Underwriting Risk</i>	37,472
<i>Diversification</i>	(7,618,903)
<i>Intangible assets (related risk)</i>	-
<b>Operational risk</b>	<b>2,331,669</b>
<b>Loss absorbency of future profit sharing</b>	<b>(225,260)</b>
<b>Loss absorbency of deferred taxes</b>	<b>(438,750)</b>
<b>Own funds to cover SCR</b>	<b>23,515,166</b>
<b>Solvency ratio</b>	<b>138.9%</b>
<b>Free surplus</b>	<b>6,580,919</b>

Table 15. Risk profile and the composition of the SCR

## C.2 Underwriting Risk

### C.2.1 Description of Risk

Underwriting risk includes the following risk components:

- Non-life underwriting risk
- Life underwriting risk
- Health underwriting risk

#### Non-life underwriting risk

Non-life underwriting risk is defined as follows:

- The risk of loss, or of adverse change in the value of insurance liabilities, resulting from fluctuations in the timing, frequency and severity of insured events, and in the timing and amount of claim settlements (reserve and premium risk).
- The risk of loss, or of adverse change in the value of insurance liabilities, resulting from significant uncertainty of pricing and provisioning assumptions related to extreme or exceptional events (catastrophe risk).

#### Life underwriting risk

Life underwriting risk is defined as follows:

- The risk of loss, or of adverse changes in the value of insurance liabilities resulting from fluctuations concerning the mortality rates which are ascribed to an increase (mortality risk) or decrease in the mortality rate (longevity risk).

- The risk of loss, or of adverse changes in the value of insurance liabilities resulting from fluctuations concerning the disability, illness and morbidity rates (disability-/morbidity risk).
- The risk of loss, or of adverse changes in the value of insurance liabilities resulting from fluctuations concerning the administrative expenses (operating expenses) of insurance and reinsurance contracts (life insurance expense risk).
- The risk of loss, or of adverse changes in the value of insurance liabilities resulting from fluctuations concerning the revision rates for annuity insurances, which are ascribed to changes in the legal environment (revision risk).
- The risk of loss, or of adverse changes in the value of insurance liabilities resulting from fluctuations concerning the lapse, cancellation, renewal and surrender rates of insurance policies (lapse risk).
- The risk of loss, or of adverse changes in the value of insurance liabilities, resulting from a significant uncertainty of pricing and provisioning assumptions related to extreme or irregular events (life catastrophe risk).

### **Health underwriting risk**

Health underwriting risk is defined as follows:

- The risk of loss, or of adverse changes in the value of insurance liabilities resulting from fluctuations concerning the costs incurred in servicing insurance and reinsurance contracts.
- The risk of loss, or of adverse changes in the value of insurance liabilities resulting from fluctuations concerning the timing, the frequency and the severity of insured risks, as well as the amount of performance regulations at the time of the provisioning.
- The risk of loss, or of adverse changes in the value of insurance liabilities, resulting from a significant uncertainty of pricing and provisioning assumptions in respect of outbreaks of larger epidemics and the risks related to them.

### **C.2.2 Risk Exposure**

#### **Non-life underwriting risk and health underwriting risk similar to non-life insurance**

In UNIQA's partial internal model, non-life underwriting risk is modelled jointly with Health underwriting risk similar to non-life insurance (NSLT) which includes short-term accident and health insurance. These risks are displayed in Table 16 below. The amounts shown are allocated figures including diversification effects. The premium risk figures shown in the table also include catastrophe risk (the risk of natural catastrophes, man-made catastrophes and catastrophic accidents) and business risk (the risk that future premiums and costs deviate from the plans). The largest component of the risk module is non-life premium risk, which is dominated by the Motor vehicle liability insurance, Fire and other property insurance and Other motor insurance lines of business.

Position	in Thousand HUF	2022 in %
<b>SCR non-life underwriting risk</b>	<b>7,845,903</b>	
Non-life premium risk (allocated)	7,044,666	89.8%
Non-life reserve risk (allocated)	572,239	7.3%
Health NSLT premium risk (allocated)	189,982	2.4%
Health NSLT reserve risk (allocated)	39,015	0.5%

Table 16. Composition of the risk module non-life underwriting risk and health underwriting risk similar to non-life

### Life underwriting risk

This risk module was the second largest component of the company's SCR at the end of 2022, contributing 28 per cent of the basic solvency capital requirement (BSCR).

Table 17 illustrates the composition of the solvency capital requirements of life underwriting risk for each sub-risk module.

The biggest sub-risk is lapse risk: in this sub-module the most adverse one of three alternative shocks (increase in lapse rates, decrease in lapse rates, mass lapse scenario) is selected. For UNIQA Biztosító Zrt. the dominant scenario is the mass lapse shock. The second biggest sub-risk is expense risk: this sub-module reflects the impact of simultaneous significant shocks affecting both the level and the annual inflation rate of life underwriting expenses. The largest part of both lapse and expense risk is related to the unit-linked portfolio of the company.

The sub-risk modules for longevity and revision risk arise in respect of non-life annuities, mainly in respect of Motor TPL claims.

Position	in Thousand HUF	2022 in %
<b>SCR life underwriting risk</b>	<b>6,423,311</b>	
Mortality Risk	341,296	4.2%
Longevity Risk	27,696	0.3%
Disability Risk	26,525	0.3%
Lapse Risk	4,659,902	57.1%
Expense Risk	2,140,717	26.2%
Revision Risk	20,524	0.3%
CAT Risk	949,974	11.6%
<i>Diversification</i>	<i>(1,743,324)</i>	

Table 17. Composition of the risk module life underwriting risk

### Health underwriting risk similar to life insurance

Health underwriting risk (similar to life insurance, SLT) includes long-term health insurance contracts. The tables below illustrate the composition of the solvency capital requirements of health underwriting risk (similar to life insurance) by sub-risk module, and of health catastrophe risk similar to life insurance. Disability and morbidity risk is the main risk driver within this risk module. The marginal catastrophe risk component reflects the mass accident risk related to all accident contracts.

Position	in Thousand HUF	2022 in %
<b>SCR health underwriting risk</b>	<b>37,472</b>	
Health underwriting risk similar to life	37,357	98.8%
Health insurance CAT risk similar to life	448	1.2%
<i>Diversification</i>	<i>(334)</i>	

Table 18. Composition of the risk module Health underwriting risk

Position	in Thousand HUF	2022 in %
<b>SCR health underwriting risk similar to life</b>	<b>37,357</b>	
Mortality risk	1	0.0%
Longevity risk	0	0.0%
Disability/Morbidity risk	30,463	62.8%
Lapse risk	10,866	22.4%
Expense risk	7,202	14.8%
Revision risk	-	0.0%
<i>Diversification</i>	<i>(11,174)</i>	

Table 19. Composition of the risk module Health underwriting risk - details

### C.2.3 Risk Assessment

This section gives a brief overview of the risk quantification methods used for determining the solvency capital requirement.

#### Non-life underwriting risk and health underwriting risk similar to non-life insurance

Non-life underwriting risk, including health underwriting risk similar to non-life insurance is quantified by a partial internal model developed by UNIQA Group and approved by the regulator since late 2017. The partial internal model generates a probability distribution forecast of the economic underwriting result on a one-year time horizon via stochastic simulation. In particular, the following stochastic risk drivers are modelled:

- Premium Risk
  - Business risk: premium rates, risk years exposure and operating costs
  - Non-CAT claims: attritional losses and individual large losses
  - CAT claims: natural catastrophe losses and man-made catastrophe scenarios
- Reserve risk
  - Reserve run-off result

The capital requirement is determined as the 99.5 per cent VaR (Value-at-Risk) of the simulated economic underwriting loss. The probability distributions of the individual risk drivers are based on company-specific parameterisation derived from historical experience and forecast information.

Simulated natural catastrophes are drawn from event-loss tables generated by external catastrophe models. The aggregation of the stochastic variables is done by the Gaussian copula method, taking into account the dependencies between lines of business and between risk drivers.

The partial internal model uses a more granular line-of-business structure than the standard formula, which allows the modelling of the risk mitigating impact of individual reinsurance arrangements, including non-proportional reinsurance contracts. The calculation of non-life underwriting risks also covers unexpected losses generated by new business to be acquired within the following 12 months.

**Life underwriting risk<sup>3</sup>**

The solvency capital requirement for life underwriting risk and risk mitigation from future profit participation are calculated by applying the risk factors and methods which are described in the Delegated Regulations 2015/35 in the chapter concerning the module underwriting risk.

The solvency capital requirement per sub risk module is derived from the change of Best Estimates for guaranteed payments under shock. The following figure illustrates the Net Asset Value (NAV) approach.

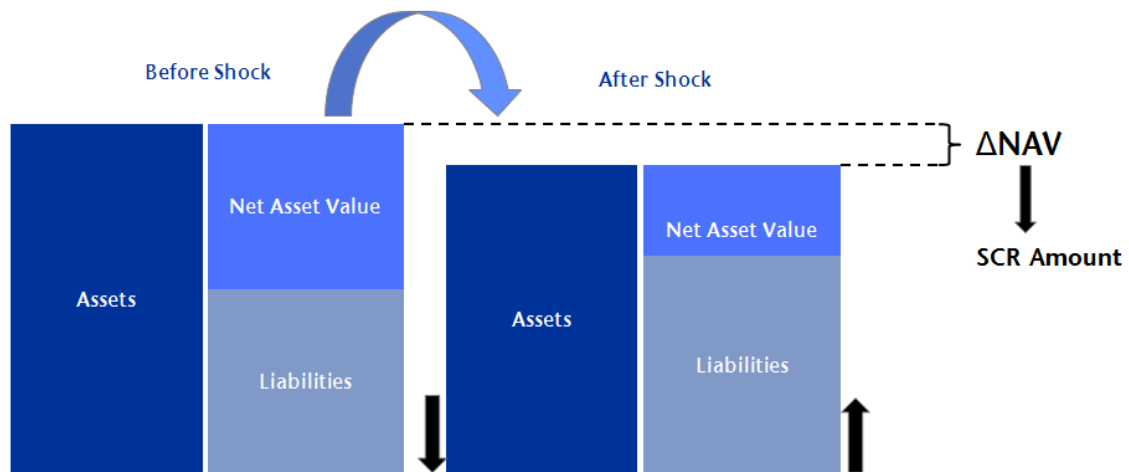


Figure 13. NAV approach

The following table illustrates the application of shocks per sub risk module under the NAV approach. The NAV is calculated on this basis.

<sup>3</sup> Delegated Regulation (EU) 2015/35, Chapter V, Section 3, Article 136ff

Sub risk module	Used shock
Mortality risk	Instantaneous permanent increase of mortality rate by 15%
Longevity risk	Instantaneous permanent decrease of mortality rate by 20%
Disability risk	A combination of the following instantaneous permanent changes: increase of disability and morbidity rate by 35% within the following 12 months, 25% within the time after the following 12 months, as well as a decrease of disability and morbidity rate by 20%.
Lapse risk	3 shocks are being used: <ul style="list-style-type: none"> <li>• imminent and constant decrease concerning the exercise of option rights by 50%</li> <li>• imminent and constant increase concerning the exercise of option rights by 50%</li> <li>• a mass lapse based on a combination of different imminent events</li> </ul>
Cost risk	A combination of the following imminent and constant events: <ul style="list-style-type: none"> <li>• An increase of costs by 10%, as well as</li> <li>• An increase of cost inflation rate by 1 percent point</li> </ul>
Revision risk	An imminent and constant increase of annual payments for annuities, which are exposed to a revision risk by 3%
CAT risk	An imminent, inconstant increase of 0.15 % of the mortality rates for the next 12 months expressed in percentage points

Table 20. Application of shocks per sub risk module under the NAV approach

In respect of almost all of the life insurance portfolio, the life underwriting risk sub-modules have been calculated according to the standard scenario-based approaches. In respect of part of life insurance business without profit participations (including group life insurance contracts), factor-based simplifications according to Articles 91, 93, 94 and 96 of the Delegated Regulation (EU) 2015/35 have been used to calculate the life mortality, life disability-morbidity, life expense and life catastrophe capital requirements. The capital requirements calculated via simplifications covered 37% of life mortality risk, 54% of life disability-morbidity risk, 1% of life expense risk and 94% of life catastrophe risk.

Undertaking-specific parameters have not been used in the calculation of life underwriting risk.

Applying the correlation factors, which are described in the Delegated Regulation 2015/35, the results of sub-risk modules are aggregated in order to determine the solvency capital requirement for life underwriting risk. Regarding lapse risk, the most adverse one of 3 scenarios (increase of lapse rates, decrease of lapse rates, mass lapse scenario) is taken into account in the aggregation.



### Health underwriting risk similar to life insurance<sup>4</sup>

The Health SLT underwriting risk sub-modules have been calculated according to the standard scenario-based approach for the following relevant submodules: Longevity risk, Disability-morbidity risk, Lapse risk, Expense risk. Undertaking-specific parameters have not been used in the calculation.

Applying the correlation factors, which are described in the Delegated Regulation 2015/35, the results of sub-risk modules are aggregated for health underwriting risk (similar to life insurance).

In order to calculate the catastrophe risk for health insurance, three different stress scenarios are calculated. The scenarios include a) the mass accident risk, b) concentration risk for accidents and c) pandemic risks. The results of these scenarios are correlated into one catastrophe risk. As at end-of-year 2022, the health catastrophe risk profile of the company (other than those risks similar to non-life, covered by the partial internal model) only included the mass accident risk.

#### C.2.4 Risk Concentration

Material underwriting concentrations exist in non-life underwriting risk, in particular regarding catastrophe risk, as explained below. It is noted on the other hand that the probability of a catastrophic event causing a major loss due to this risk concentration is low, furthermore the risk for the company is strongly reduced via reinsurance arrangements covering catastrophic losses.

#### Non-life underwriting risk

The essential risk concentration is the exposure to natural catastrophe risk, most importantly to the earthquake and flood perils.

Regarding the earthquake peril, UNIQA Biztosító Zrt. has a risk concentration in the Budapest area (industrial and property risk concentration). While seismic activity in the area of Hungary has been moderate historically, nonetheless a number of destructive earthquakes have been recorded at return periods upward from hundred years. This includes some historical events in the larger Budapest area, which, if repeated, could cause significant gross loss to the company. Regarding floods, events affecting the Danube river catchment area may cause flooding simultaneously along several river sections in Hungary, which could hit insured property across a large geographical area.

Natural catastrophe risk is analysed by UNIQA Biztosító Zrt. via the natural catastrophe module of the company's Partial Internal Model Non-Life, approved by the regulator since late 2017. Alongside earthquake and flood, this model includes peril components covering also windstorm and hail events.

On the basis of the results of these models, appropriate risk management measures are taken. Uniform policies and standards are in place in UNIQA Biztosító Zrt., in line with those of UNIQA Group, aiming to guarantee existence of comprehensive risk management processes and risk mitigation measures that reduce the risks to a big extent. The most essential risk mitigation measures are appropriate guidelines for underwriting (for example no sale of flood insurance for buildings in unprotected floodplain areas) as well as the purchase of sufficient reinsurance protection to cover potential loss accumulation due to natural catastrophes.

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<sup>4</sup> Delegated Regulation (EU) 2015/35, Chapter V, Section 4, Article 144ff

## C.2.5 Risk Mitigation

### Non-life underwriting risk

Increasing the profitability of the non-life portfolio of UNIQA Biztosító Zrt is an element of the company's strategy, consistent with the group-level UNIQA 3.0 strategy, which defines a longterm strategy for UNIQA Group and sharpens the focus on core business. A targeted continuous process of in-force management and a consistent assessment of tariffs are essential components. The latter represents a vital prerequisite for the calculation and the distribution of premiums adapted to risk.

Reinsurance is an essential risk mitigation technique for the non-life insurance of UNIQA Biztosító Zrt. It is additionally used in order to reduce the earnings volatility as capital and risk management tool and as a substitute of risk capital. UNIQA Re AG serves as a service entity within UNIQA Group. UNIQA Re AG is responsible for coordination, internal arrangements and external reinsurance relationships and helps optimise the Group's risk capital commitments. This structure permits on the one hand to balance risks internally and on the other hand to acquire effective retrocession cover and is therefore crucial for the risk strategy of both the Group and UNIQA Biztosító Zrt. The organisation and the acquisition of reinsurance cover serve to control the necessary risk capital.

The effectiveness of the risk control and risk mitigation techniques described for non-life business is monitored within the Partial Internal Model (PIM) Non-life. A quantified measurement of reinsurance cover is affected by means of key figures, such as the Return on Risk Adjusted Capital (RoRAC) and the Economic Value Added (EVA), both before and after the deduction of reinsurance cover.

#### ***Use of reinsurance***

UNIQA's risk mitigation technique is mainly reinsurance.

The reinsurance activities are centralised at the group-owned reinsurance company UNIQA Re AG (UNIQA Re) in Zurich. This structure allows balancing risks internally as well as purchasing efficient retrocession cover and is therefore central to UNIQA's risk strategy. UNIQA Re constitutes the central point of a complex system of reinsurance relationships within UNIQA Group, but also with external parties. UNIQA Group Reinsurance Policy defines the minimum group-wide standards how affected parties shall interact in that system.

The organisation and purchase of external reinsurance covers (retrocession) is of high importance to reduce the required risk capital and to balance results of UNIQA Group. All decisions concerning reinsurance cessions will be made taking into account their effects on needed risk capital. In particular an efficiency analysis of reinsurance cover has to be established for each class/contract. UNIQA Re has to make an adequate return on capital within the group's target and in addition, participates in the appropriate maximisation of the group's return. The risk appetite of UNIQA Insurance Group is reflected in its target net economic capital ratio as defined in the risk strategy. Therefore, the level of risk transfer to UNIQA Re is indirectly predefined via planning of the target net economic capital requirement (ECR). If the planned ECR is not in line with the target ECR, adjustment of reinsurance can be used as a substitute for available risk capital.

Based on the results of the UNIQA partial internal model, UNIQA Re and UNIQA Biztosító Zrt. regularly check the reinsurance structure and the conditions that are most appropriate to achieve solvency targets considering the underwriting risk profile. Generally, reinsurance is structured in such a way that the relief of required capital and capital costs is efficient compared to the cost of reinsurance.

The organisation and the purchase of external reinsurances provide essential advantages for the optimisation and controlling of the required risk capital. The amount of risk transfer to the UNIQA Re AG, Switzerland, as well as to external retrocessionaires are defined depending on the planning of the solvency capital requirements, which are defined by developing the risk strategy.

### **Life underwriting risk**

As a classical risk mitigation technique, reinsurance is used. Concerning life insurance, the focus of the reinsurance program is the mitigation of large individual risks. In addition, group insurance contracts are covered by specific reinsurance arrangements.

In addition, the following classical risk control techniques are used in the context of life insurance:

- Risk selection when preselecting interested parties for life insurance products (for example by means of health checks)
- A prudent selection of mortality and life tables in order to make sure that they correspond with the policyholders within UNIQA Biztosító Zrt.

Apart from these classical risk control techniques, UNIQA Biztosító Zrt. applies a strategic program in order to ensure the sustainability of the business model. The aim of this strategic program is to pursue profitable life insurance business also in a low-interest rate environment with the existing risk budget.

The success of the strategic program is measured within the annual calculation of the Embedded Value (EV) and calculated as Value of In-Force (VIF) and New Business Value (NBV). The calculation of EV reflects the value of personal insurance as well as the current situation in the financial markets. The VIF corresponds with the net present value of all profits from life insurance, respectively the NBV with the net present value of future annual surpluses, which can be generated from new in-force business of the current year. This assessment basis represents the main instrument for monitoring the effectiveness of the techniques mentioned above.

The effectiveness of the described risk mitigation measures for life-business is monitored on an ongoing basis. A quantified measurement is affected by means of the key figures Embedded Value and New Business Value/Margin.

### **Health underwriting risk**

As a classical risk mitigation technique, reinsurance is used.

In addition, classical risk control techniques are applied in the context of health insurance. These include:

- Risk selection, in particular: targeted pre-selection of interested parties (for example by means of health checks)
- The consideration of premium adjustment clauses in different health insurance products in order to be able to adjust the premiums corresponding to the changes of calculation bases.

Besides the classic risk control processes, continuous in-force management is carried out on a regular basis. The effectiveness of the risk control techniques for health business is assessed by comparison of expected and occurred payments as well as contribution margin calculation.

## C.3 Market Risk

### C.3.1 Description of Risk

The market risk reflects the risk arising from the level or volatility of market prices of financial instruments, which have an impact upon the value of the assets and liabilities of the undertaking. It has to adequately reflect the structural incongruity between assets and liabilities, with special regard to their duration. As part of the SCR model, market risk is divided into the following sub-risk modules illustrated in Table 21 that are in line with Directive 2009/138/EC.

<b>Sub risk module</b>	<b>Used shock</b>
Currency risk	The sensitivity of the values of assets, liabilities and financial instruments to changes in the level or in the volatility of currency exchange rates.
Interest rate risk	The sensitivity of the values of assets, liabilities and financial instruments to changes of the interest rate curve or in the volatility of interest rates.
Equity risk	The sensitivity of the values of assets, liabilities and financial instruments to changes in the level or in the volatility of market prices of equities.
Property risk	The sensitivity of the values of assets, liabilities and financial instruments to changes in the level or in the volatility of market prices of real estate.
Spread risk	The sensitivity of the values of assets, liabilities and financial instruments to changes in the level or in the volatility of credit spreads over the risk-free interest rate curve.
Concentration risk	Additional risks to an insurance or reinsurance company stemming either from lack of diversification in the asset portfolio or from large exposure to default risk by a single issuer of securities or a group of related issuers.

Table 21. Sub-risk modules of market risk

### C.3.2 Risk Exposure

The figure below shows the asset allocation of the non-unit linked investment portfolio of the UNIQA Biztosító Zrt. as at end-of-year 2022. The total volume of the non-unit linked investments displayed in the pie diagram was 41,773 million HUF at the end of the year.

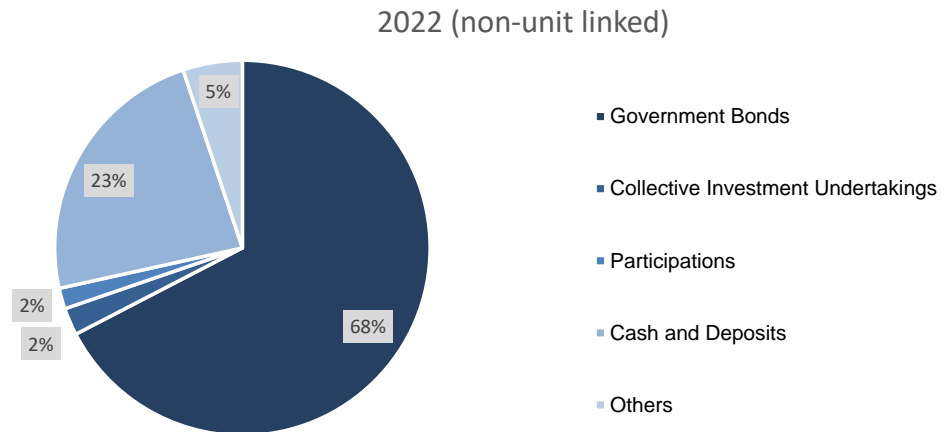


Figure 14. Asset allocation of the non-unit linked investment portfolio

In accordance with the prudent person principle, the investment activities in 2022 – just as in prior years – were strongly influenced by an investment approach oriented towards the liability side. Investments other than unit-linked have been dominated by Hungarian government bonds, selected to optimally match expected liability cash flows.

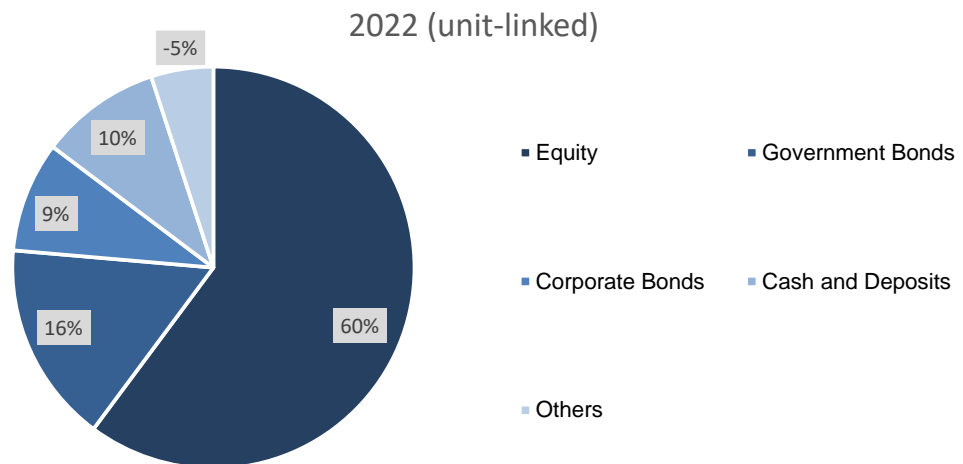


Figure 15. Asset allocation of the unit linked investment portfolio

Figure 15 shows the asset allocation of the unit linked investment portfolio, totalling 126,777 million HUF at the end of 2022. Unit-linked investments were driven by the policyholders’ portfolio selections.

Table 22 illustrates the composition of the solvency capital requirements for the risk module market risk. Because extreme shocks for particular market risks usually do not occur simultaneously, the aggregated need for capital for individual sub risk modules is smaller than the sum of the risk requirements and therefore a pure addition would display an overestimation of risk.

Position	in Thousand HUF	2022 in %
SCR Market Risk	<b>6,322,866</b>	
Interest rate risk	4,442,124	45.6%
Equity risk	2,447,224	25.1%
Property risk	81,791	0.8%
Spread risk	409,810	4.2%
Concentration risk	251,439	2.6%
Currency risk	2,102,699	21.6%
<i>Diversification</i>	<i>(3,412,221)</i>	

Table 22. Composition of the solvency capital requirements for the risk module market risk

As at the end of 2022, market risk contributed 28% of the basic solvency capital requirement (BSCR) of the company before diversification. On the one hand this is a significant risk in the company's risk profile, on the other hand its level is moderate compared to the volume of the exposed assets (and liabilities). This is attributable to the fact that the dominant part of the market risk-exposed portfolio is unit-linked business where the investment risk is borne by the policyholders.

The three largest sub-risks of market risk are interest rate risk, equity risk and currency risk. The biggest sub-risk module is interest rate risk, reflecting the sensitivity of technical provisions and their covering fixed-income investments to changes in the risk-free interest rate term structures with the change in current yield curve environment having a big impact on this risk. Of these sub-risks, equity risk is mainly attributable to unit-linked business, where the asset-side shocks are largely absorbed by the liability side, nonetheless a residual part of the shock affects the company's net asset value due to the impact on expected future profits. The third biggest sub-risk module is currency risk, which is mainly attributable to unit-linked business (however this risk has been partly mitigated by the use of currency derivatives) and also related to euro cash savings (non-life assets).

### C.3.3 Risk Assessment<sup>5</sup>

UNIQA Biztosító Zrt. calculates the market risk according to the standard formula, as described in the Delegated Regulation (EU) 2015/35. Market risk consists of sub-risk modules, as defined in the standard formula, which are aggregated by a correlation matrix. For the correlation between interest rate risk and equity risk, property risk and spread risk, two alternate factors are specified depending on the relevant interest rate shock. In the case of UNIQA Biztosító Zrt. a zero correlation factor has been used as the scenario of an increase in interest rates causes a higher capital requirement for interest rate risk.

The calculation of the capital requirements for the different sub risk modules is elaborated on below.

#### Interest rate risk

The capital requirements for interest rate risk are calculated by applying two stress scenarios to all assets which are sensitive to interest rate changes and by determining the resulting loss of basic own funds. One of the scenarios simulates an increase in interest rates and the other one a decrease in

<sup>5</sup> Delegated Regulation (EU) 2015/35, Chapter V, Section 5, Article 164ff

interest rates. However, only the scenario which causes the more adverse change is considered relevant for the calculation of capital requirements. The scenarios are applied to the risk-free interest rate term structure for the respective currency published by EIOPA and the impacts on the capital requirements are ultimately aggregated. According to the standard approach, a distinction shall be made between the two following scenarios:

- Scenario for an increase in interest rates: The estimated increase of the interest rate fluctuates between 70 per cent for maturities up to two years and 26 per cent with maturities of 20 years. Starting from maturities of 20 years, the increase in interest rates is linearly reduced to 20 per cent for maturities of 90 years or more. In any case, the increase of interest rates amounts to at least one percentage point.
- Scenario for a decrease in interest rates: The estimated decrease of interest rates fluctuates between 75 per cent with maturities up to one year and 29 per cent with maturities of 20 years. Starting from maturities of 20 years, the decrease in interest rates is linearly reduced to 20 per cent for maturities of 90 years or more. The decrease of risk-free base interest rates equals zero.

In the case of the year-end 2022 calculation, the scenario of an increase in interest rates causes higher capital requirements and is therefore considered as the basis for the calculation of UNIQA Biztosító Zrt.

### **Equity risk**

For the calculation of equity risk, UNIQA Biztosító Zrt. uses the standard approach according to Articles 168–169, 171–172 of Delegated Regulation (EU) 2015/35. It is based on calculating the impact of scenario-based shocks including a symmetric adjustment factor on the Net Asset Value and the resulting consequences on the basic own funds of the company.

In the context of the standard approach, Type 1 and Type 2 equity risks are distinguished:

- Type 1 equities: Equities listed in regulated markets in countries which are members of the EEA or the OECD.
- Type 2 equities: Equities listed in stock exchanges in countries which are not members of the EEA or the OECD, equities which are not listed commodities and other alternative investments. They also comprise all other assets other than those covered in the sub risk modules interest rate risk, property risk or spread risk, including exposures to collective investment undertakings where a look-through approach is not possible.

For the calculation of the capital requirements for equity risk the following scenarios shall be used:

- Scenario for Type 1 equities: An instantaneous decrease of the market value of 39 per cent plus a symmetric adjustment of up to (+/-) 10 per cent, as well as an instantaneous decrease of 22 per cent of the market value of strategic equity investments in related undertakings.
- Scenario for Type 2 equities: An instantaneous decrease of the market value of 49 per cent, plus a symmetric adjustment of up to (+/-) 10 per cent, as well as an instantaneous decrease of 22 per cent of the market value of strategic equity investments in related undertakings.

The capital requirements for Type 1 and Type 2 equity risk are aggregated by using a correlation factor of 0.75.

**Property risk**

The calculation of the capital requirements for property risk corresponds to a loss of basic own funds resulting from an instantaneous decrease of the value of all real estate values by 25 per cent. It is noted that, as at the end of 2022, while applying lookthrough approach a non-significant exposure to property risk is observed.

**Spread risk**

The capital requirement for spread risk is calculated by aggregating the sum of the capital requirements under stress scenarios for bonds and loans, securitisations and credit derivatives. According to the standard formula, certain derogations apply to bonds, loans and derivatives related to certain organisations, governments and banks.

In the case of UNIQA Biztosító Zrt., only the calculation for bonds and loans has been relevant. Marginal exposures to securitisations and credit derivatives have been present only in those parts of the investments in collective investment undertakings where the look-through approach has not been possible. Regarding the derogations mentioned above, those relating to Member States' government bonds are relevant for the company's portfolio, resulting in a zero risk factor for Hungarian government bond investments.

The capital requirement for bonds and loans (excluded are mortgage loans for residential properties) is determined by a factor-based calculation under a stress scenario. The calculation assumes the market value of the instrument and considers credit rating and duration. It is assumed that the spreads of all instruments will rise, which will lead to an imminent decrease in the value of bonds. The shock of the spread risk of bonds and loans is a concave function of the duration.

**Concentration risk**

The capital requirement for the concentration risk is calculated by applying risk factors depending on the credit quality step, defined in accordance with the standard formula, to single name exposures in excess of pre-defined concentration thresholds. Thresholds are defined for each credit quality step. Provided that the thresholds are exceeded, the risk factors prescribed in the standard formula shall be applied to the surplus of risk exposure above the threshold and the sum of all requirements shall be aggregated

According to the standard formula, exceptions and derogations apply to the calculation of concentration risk, which exclude certain risk exposures from the calculation. Most importantly in the case of UNIQA Biztosító Zrt., unit-linked investments and cash-at-bank exposures in the scope of the counterparty default risk module are not included in the calculation base for determining the concentration thresholds. Furthermore the company's holdings in Hungarian government bonds are subject to a zero risk factor.

**Currency risk**

The capital requirements for currency risk are calculated by applying two foreign currency shocks, defined according to the standard formula, to every single relevant foreign currency and by determining the resulting consequences for the own funds. Currency risk concerns all currency sensitive positions on the asset side and on the liability side. The consequences of the shocks for the original own funds are aggregated. According to the standard approach, every foreign currency whose exchange rate fluctuations effect the company's basic own funds is considered relevant.



Two shocks are applied to every currency for the calculation of currency risk. However, only the shock, which produces the greater adverse change, is considered relevant for the calculation of capital requirements. According to the standard approach, a distinction shall be made between the following foreign currency shocks:

- Increase in the value of the foreign currency in comparison to the local currency by 25 per cent.
- Decrease in the value of the foreign currency in comparison to the local currency by 25 per cent.

### **Look-through approach**

According to Article 84 of Delegated regulation (EU) 2015/35, the capital requirement for market risk is calculated on the basis of each of the underlying assets of collective investment undertakings and other investments packaged as funds. Where the look-through approach cannot be applied because of the lack of available data, the Type 2 equity shock is applied to the asset value.

#### **C.3.4 Risk Concentration**

A minor concentration risk component has been present in the end-of-year 2022 market risk profile of the company due to intra-group exposures: strategic participations.

In addition to the assessment of concentration risk according to the SCR standard formula, all issuers (groups of issuers respectively) are monitored in accordance with UNIQA Group Risk Management Standard, based on economic risk measurement.

#### **C.3.5 Risk Mitigation**

##### **Derivative Instruments**

Since late 2017, currency derivatives have been used by UNIQA Biztosító Zrt. as a risk mitigation technique to reduce the significant currency risk profile. Plain vanilla EUR and USD put options are held in order to protect the company's own funds against an extreme drop in the rates of these foreign currencies against the local currency. As these options have been selected to cover the tail risk, they are out-of-the-money under normal circumstances, however they are available to the company at a low cost and they respond to currency shocks in an asymmetrical manner: they gain a high value in the case of an extreme currency fall scenario. The use of currency derivatives as a risk mitigation technique, including the planning of derivative transactions, the selection of counterparties, the regular replacement of the instruments and the monitoring of the risk mitigating effect is regulated by the Solvency 2 Market Risk Mitigation Policy of the company.

##### **Investment Limits**

With the introduction of the UNIQA Group Limit & Trigger Standards and UNIQA Investment Process Standards, a harmonisation of the existing regulations for investment activities was introduced by Group Actuarial & Risk Management in the year 2016. UNIQA Group Limit & Trigger Standards has since then been integrated into UNIQA Group Risk Management Standard. These regulations were directed to all insurance companies with an asset management outsourcing agreement in force with UNIQA Capital Markets GmbH (UCM) and contain detailed descriptions of all limits available by Group Actuarial and Risk Management as well as procedures relevant for dealing with those limits. The close cooperation between local and Group risk management is particularly important given the centralized responsibility of UCM for asset management. The risk management approach reflected in the limit

system aims the measuring and controlling of asset-related market risks. Group Actuarial and Risk Management has made use of the Strategic Asset Allocation (SAA) approach. Based on the risk profile of the SAA, the premise of the market risk limits is that each market sub-risk, as well as consequently the total market risk of the portfolio stemming from the asset side, shall remain within a pre-determined range for the relevant calendar year. Investment limits are monitored every two weeks.

### **Asset-Liability Management**

Projected cash flows of traditional life insurance (broken down by guaranteed interest rate), non-life insurance (broken down by currency) and health insurance are regularly reported by local actuaries to UCM via Group Actuarial Department. Asset allocations thereafter are managed centrally by UCM, aiming for an optimal match between the maturity and currency profiles of liabilities and covering investments. In coordination between UNIQA Group and local asset management and actuaries, held-to-maturity (HTM) bond portfolios have been established to match the projected cash flows stemming from life insurance contracts with 3.5% or higher guaranteed rates.

It is noted that the unit-linked portfolio, where the investment structure is driven by policyholders' risk appetite, is not in the scope of the ALM scheme.

## **C.4 Credit Risk**

### **C.4.1 Description of Risk**

In accordance with Directive 2009/138/EC (Article 105), credit risk or default risk shall reflect possible losses due to unexpected default, or deterioration in the credit standing, of the counterparties and debtors of insurance and reinsurance undertakings over the following 12 months. The credit risk/default risk covers risk mitigating contracts such as reinsurance agreements, securitisations and derivatives, as well as receivables from intermediaries and all other credit risks, which are not covered by the spread risk module. It shall take account of collateral or other securities held by or for the account of the insurance or reinsurance company and the risks associated therewith. For each counterparty, the credit risk/default risk shall take into account the overall counterparty risk exposure of the insurance concerning that counterparty, irrespective of the legal form of its contractual obligations to that company.

Credit risk or default risk is composed of the two following types:

- Risk exposure type 1: The class of type 1 exposures covers the exposures which may not be diversified and where the counterparty is likely to be rated. Among others, this type usually comprises: reinsurance agreements, derivatives, securitisations, bank deposits, other risk mitigating contracts, letters of credit, guarantees and products with third party guarantors.
- Risk exposure according to type 2: Usually comprises all exposures which are not covered by the sub-risk module spread risk, but are usually highly diversified and do not have a rating. Among others, this type usually comprises: receivables from intermediaries, receivables from policyholders, other receivables and mortgage loans.

### **C.4.2 Risk Exposure**

With a contribution of 10% to the basic solvency capital requirement (BSCR) before diversification at end-of-year 2022, credit risk / default risk (CDR) is not a dominant but still a significant part of the company's risk profile.

Position	in Thousand HUF	2022 in %
<b>CDR total</b>	<b>2,254,838</b>	
CDR type 1 total	1,660,794	69.7%
CDR type 2 total	723,558	30.3%
<i>Diversification</i>	<i>(129,514)</i>	

Table 23. Composition of the solvency capital requirements for the risk module credit risk

Table 23 shows the composition of credit risk or default risk for the year 2022. A distinction is made between type 1 and type 2 of risk exposure.

With a 70.0 per cent share of the overall credit / default risk excluding diversification, type 1 risk exposure is the main driver of the risk. The solvency capital requirements for type 1 CDR result primarily from reinsurance arrangements, secondly from deposits at credit institutions, thirdly from derivatives.

Risk exposures of type 2 have a 30.0 per cent share of the overall CDR risk before diversification. Receivables from intermediates and policyholders are the main drivers for this risk exposure.

#### C.4.3 Risk Assessment<sup>6</sup>

The risk factors and methods described in the Delegated Regulation 2015/35, in the chapter concerning the module counterparty default risk, are used for the calculation of the solvency capital requirement for credit risk or default risk.

The capital requirement for type 1 exposures is determined based on the Loss-Given-Default (LGD) and Probability of Default (PD) of each counterparty. The definition of the standard formula includes precise definitions for the calculation of the LGD and PD dependent on the form of exposure. In addition it is specified to what extent the risk mitigating effect of collateral can be used. The capital requirement for type 2 exposures is calculated from exposed amounts by applying a factor-based formula including standard risk factors. The capital requirements for type 1 and type 2 CDR are aggregated by using a correlation factor of 0.75.

For the CDR calculation as at the end of 2022 UNIQA Biztosító Zrt. has used partial internal model inputs for determining the LGD of non-life reinsurance counterparties.

#### C.4.4 Risk Concentration

From the perspective of UNIQA Biztosító Zrt., the reinsurance exposure to UNIQA Re AG presents the significant part of counterparty risk concentration. On the other hand the establishment of an in-house reinsurance company centralising all business units' reinsurance cessions has been a strategic decision by UNIQA Group which allows the optimisation of external retrocessions at the Group level. UNIQA Re AG is responsible for the selection of external reinsurers. For that purpose, UNIQA Re has determined a policy which regulates the selection of counterparties and avoids external concentrations (e.g. there are limits on the share of individual external reinsurers in each contract and there is a minimum rating requirement in place).

<sup>6</sup> Delegated Regulation (EU) 2015/35, Chapter V, Section 6, Article 189ff

### C.4.5 Risk Mitigation

UNIQA Biztosító Zrt. uses the following measures in order to control credit risk or default risk:

- Limits
- Minimum ratings
- Reminder procedures

All reinsurance arrangements between UNIQA Biztosító Zrt. are coordinated with UNIQA Re AG and are subject to the standards determined by UNIQA Re. For external reinsurers, minimum ratings and an upper limit for the released exposure per reinsurer are defined.

In order to avoid concentrations concerning default risk and credit risk, limits on bank deposits are defined. These limits are monitored every two weeks.

Derivative instruments are also subject to limits and minimum counterparty rating requirements.

To keep the level of receivables from insurance intermediates and insurance companies as low as possible, clear reminder procedures were implemented. These are subject to regular monitoring by precise evaluation possibilities.

## C.5 Liquidity Risk

### C.5.1 Description of Risk

Liquidity risk is composed of market liquidity risk and refinancing risk. Liquidity risk represents the risk that an asset cannot be traded fast enough to prevent a loss or make the required profit. Refinancing risk can arise if the insurance undertaking is unable to realise assets in order to settle their financial obligations when they are due.

### C.5.2 Risk Exposure

The following table shows the expected profit in future premiums, as required by Article 295(5) of Delegated Regulation (EU) 2015/35 with regard to liquidity risk.

Position	2022 in Thousand HUF
Expected profit in future premiums	15,546,081
Of which non-life	1,853,866
Of which life	13,692,214

Table 24. Expected profit in future premiums

### C.5.3 Risk Assessment and Risk Mitigation

The liquidity position of the company is monitored on an ongoing basis. In order to ensure that UNIQA Biztosító Zrt. can meet its payment obligations, a regular planning process is in place to ensure the availability of appropriate amounts of cash to cover anticipated cash flows. As part of the planning process, UNIQA Biztosító Zrt. prepares a liquidity plan. The constant adjustment and monitoring of this plan is ensured by the liquidity management process.

## C.6 Operational Risk

### C.6.1 Description of Risk

Operational risk covers the risk of financial losses, caused by insufficient internal processes, systems, personal resources or external events. Operational risk includes legal risk, but not reputation risk and strategic risk. Legal risk is the risk of financial losses due to complaints or uncertainty in the applicability or interpretation of contracts, laws or other legal requirements.

The topics of the prevention of money laundering and terrorism financing are subject to special attention. Operational risk in connection to this topic results from missing or inadequate processes of identification, monitoring, as well as reporting to prevent potential money laundering operations.

### C.6.2 Risk Exposure

UNIQA Biztosító Zrt. is exposed to operational risks in a diverse environment. These risks are regularly identified and monitored with the help of the risk management system of the company. Among others the following risks are considered significant:

- Process risks, in particular regarding product development and claims settlement
- Human Resources (HR) risks (possible shortage of personnel and dependence on individuals with the required know-how)
- IT risks (in particular the IT security and the high complexity of the IT landscape, as well as the risk of business interruption)
- Various project risks

The following table shows the composition of the SCR for operational risk as at end-of-year 2022.

	2022	
	Premium earned	Technical provisions gross
<b>Reporting year</b>		
Life (without unit-linked)	4,021,697	8,030,463
Non-Life	53,682,503	22,294,949
<b>Previous year</b>		
Life (without unit-linked)	4,103,397	
Non-Life	48,254,294	
<b>Capital requirement for Operational Risk based on Premiums / Technical Provisions</b>	<b>1,771,343</b>	<b>704,986</b>
25% of Unit-linked annual expenses	560,326	
<b>Operational risk</b>	<b>2,331,669</b>	

Table 25. Composition of the SCR for operational risk

As apparent in the table above, the dominant component of the capital requirement has been the premium-based risk charge. The component for unit-linked expenses also contributed significantly to the capital requirement.

### C.6.3 Risk Assessment

For the calculation of operational risk, UNIQA Biztosító Zrt. uses a factor-based approach, according to the standard formula as described in Article 204 of Delegated Regulation (EU) 2015/35. The capital requirement for operational risk is calculated as:

The lower of the following values:

- Basic capital requirement for operational risk, or
- 30 per cent of the calculated basic solvency capital requirement (BSCR),

plus 25 per cent of the amount of expenses in respect of life insurance whose investment risk is borne by the policyholders (i.e. unit-linked business).

The basic capital requirement for operational risk is the higher of the following two calculation results:

- Premium-based calculation: 4 per cent of the gross premiums earned for life insurance obligations (excluded are the premiums where the policyholder bears the investment risk) and 3 per cent of the gross premiums earned for non-life insurance obligations. Furthermore, in case of an increase of these premiums by more than 120 per cent in comparison to the previous year, additional margins shall be added in accordance with the standard approach.
- Technical provisions-based calculation: 0.45 per cent of the gross best estimate of the technical provisions for life insurance obligations (excluded are the provisions where the policyholder bears the investment risk) and 3 per cent of the gross best estimate of the technical provisions for non-life insurance obligations.

Furthermore, UNIQA Biztosító Zrt. performs an internal assessment process of operational risks by means of process owners and experts. These assessments are discussed with the management and the Board.

### C.6.4 Risk Concentration

The risk concentrations within operational risk are evaluated regularly and include, for example, dependencies of distribution channels, major customers or key personnel. Depending on the result of the evaluation, adequate control measures are to be put in action (e.g. risk acceptance, risk minimization, etc.) In addition, the development of risk concentrations concerning operational risk is minimized by:

- A clear and structured governance model with adequate processes
- Operating a compliance function, responsible for conforming with the rules, as well as
- A clearly stated and structured Internal Control System

### C.6.5 Risk Mitigation

Defining risk mitigating measures is an essential step in the risk management process for operational risks. In the risk strategy of UNIQA Biztosító Zrt. the risk preference for taking on operational risks is classified as “low”. Therefore, UNIQA Biztosító Zrt. shall try to reduce the operational risk as much as possible. The most important risk mitigation measures for operational risks are the following:

- Implementation and maintenance of an Internal Control System
- Optimisation and maintenance of processes
- Continuous education and training of personnel, as well as

- Preparation of emergency plans.

## C.7 Stress and Scenario Analysis

UNIQA Biztosító Zrt. uses the following definitions for sensitivities, stress tests and scenarios, which are shown in Table 26.

Sensitivity	Recalculation of a Key Performance Indicator (KPI) based on the change of one input parameter. The change is not significant / extreme and can have either a positive or negative impact.
Scenario	Impact of a KPI based on the change of generally more than one input parameter. The change can have either a positive or negative impact. Scenarios are usually linked to events (e.g. historic scenarios).
Stress test	Recalculation of a KPI based on the change of one input parameter. The change is significant / extreme with a negative impact.
Combined stress test	Recalculation of a KPI based on the change of more than one input parameter. The change is significant / extreme with a negative impact.
Reverse stress test	Definition of a scenario that gives a predefined negative result of a KPI.

Table 26. Definitions for sensitivities, stress tests and scenarios

Motivated by the risk areas important for UNIQA Group and in light of the low interest rate environment, an important focus of the sensitivity analysis is interest rate sensitivities, in addition to other market risk scenarios. UNIQA Biztosító Zrt. evaluated the sensitivities, stress tests and scenarios presented in Table 27.

No.	Key sensitivities	Impact
1	Parallel shift interest rate +100 basis points (until LLP, not floored)	Own Funds
2	Parallel shift interest rate -100 basis points (until LLP, not floored)	Own Funds
3	Parallel shift interest rate +50 basis points (until LLP, not floored)	Own Funds
4	Parallel shift interest rate -50 basis points (until LLP, not floored)	Own Funds
5	Decrease of UFR by 50 basis points	Own Funds
6	No volatility adjustment	Own Funds and SCR
7	Shock on equities -25%	Own Funds
10	Government bonds: Credit spread +50bp & dynamic volatility adjustment	Own Funds
11	Corporate debt: Credit spread +50bp & dynamic volatility adjustment	Own Funds
12	Combined Scenario 1	Own Funds
13	Combined Scenario 2	Own Funds
14	Inflation +100bp parallel shift (whole curve)	Own Funds

Table 27. List of evaluated sensitivities, stress tests and scenarios

For most of the sensitivities only the own funds impact was calculated. However the sensitivity “no volatility adjustment” included the recalculation of the SCR too.

The sensitivities, stress tests and scenarios listed above are described in detail below.

### Interest rate sensitivities

As described further below, the interest rates are only shocked for maturities where the underlying instruments can be classified as close to liquid. The last point at which an instrument can still be classified as liquid is the last liquid point (LLP). Afterwards interest rates are extrapolated to the unchanged Ultimate Forward Rate (UFR) with an unchanged convergence period. The UFR is a value that reflects the interest rates of the past decades, including forecasts on economic development in the EEA. The UFR is stressed from its base case value only in the sensitivity “decrease of UFR by 50 basis points”.

The following sensitivities focus on interest rates:

- 1. A parallel shift of the interest rate curve by +100 basis points until the last liquid point (LLP) and extrapolation towards the UFR afterwards
- 2. A parallel shift of the interest rate curve by -100 basis points until the last liquid point (LLP) and extrapolation towards the UFR afterwards
- 3. A parallel shift of the interest rate curve by +50 basis points until the last liquid point and extrapolation towards the UFR afterwards
- 4. A parallel shift of the interest rate curve by -50 basis points until the last liquid point and extrapolation towards the UFR afterwards
- 5. The Ultimate Forward Rate is decreased by 50 basis points
- 6. Use of the basic risk free yield curve as published by EIOPA without Volatility Adjustment (VA)



## Equity and equity-related instruments

For equity exposures, the following sensitivity is evaluated:

- 7. An overall -25 per cent shock is applied to all equities, including derivatives on equity securities, private equity, hedge funds, fund certificates that are not decomposed, index securities, participations, etc. Contrary to the Solvency II methodology, no differentiation is made between “equity type 1”, “equity type 2” and “strategic participations”.

## Credit spreads

For credit spreads the following sensitivities are evaluated:

- 10. A widening of the credit spread for Government bonds by 50 basis points is assumed, independent of the rating. There is no exemption for specific exposures e.g. government bonds with dynamic volatility adjustment applied
- 11. A widening of the credit spread for Corporate bonds by 50 basis points is assumed, independent of the rating. There is no exemption for specific exposures e.g. government bonds with dynamic volatility adjustment applied

## Combined scenarios

For a view on a more complex shock situation we also calculated two sensitivities with combined effects of multiple adverse events happening simultaneously. These scenarios are as follows:

- 12. Combined scenario 1 combines the following above sensitivities:
  - Parallel shift interest rate -50 basis points (until LLP, not floored) (4)
  - Corporate debt: Credit spread -50bp incl. dynVA
  - Government bonds: Credit spread -50bp incl. dynVA
  - Equity shock -25% (7)
- 13. Combined scenario 2 combines the following sensitivities:
  - Parallel shift interest rate +50 basis points (until LLP, not floored) (3)
  - Corporate debt: Credit spread +50bp incl. dynVA (10)
  - Government bonds: Credit spread +50bp incl. dynVA (11)
  - Equity shock +25%

## Results

The following table shows the results of scenarios, especially with regard to the change in Own Funds. The stressed SCR is only shown where it was recalculated.

(in 1000 HUF)		Own Funds	Change in Own Funds	SCR
Base case		23,515,166		16,934,247
<b>Key sensitivities</b>				
1	Parallel shift interest rate +100 basis points (until LLP, not floored)	22,712,660	-3.4%	
2	Parallel shift interest rate -100 basis points (until LLP, not floored)	24,467,226	4.0%	
3	Parallel shift interest rate +50 basis points (until LLP, not floored)	23,133,141	-1.6%	
4	Parallel shift interest rate -50 basis points (until LLP, not floored)	24,010,117	2.1%	
5	Decrease of UFR by 50 basis points	23,581,867	0.3%	
6	No volatility adjustment	23,673,875	0.7%	16,751,546
7	Shock on equities	22,253,624	-5.4%	
10	Government bonds: Credit spread +50bp & dynamic volatility adjustment	23,101,262	-1.8%	
11	Corporate debt: Credit spread +50bp & dynamic volatility adjustment	23,513,238	0.0%	
12	Combined Scenario 1	23,244,604	-1.2%	
13	Combined Scenario 2	21,795,602	-7.3%	
14	Inflation +100bp parallel shift (over the whole curve)	23,080,160	-1.8%	

Table 28. Results of scenarios

## C.8 Other Material Risks

In addition to the risk categories described above, the UNIQA Biztosító Zrt. has also defined risk management processes for strategic risk, reputational risk and contagion risk.

Reputational risk is the risk of losses incurred as a result of potential damage to the reputation of the company, the deterioration of its image, or a negative overall impression due to a negative perception by clients, business partners, shareholders or the supervisory authority.

Strategic risk is the risk resulting from management decisions or the inadequate implementation of management decisions with an impact on current / future earnings and solvency. It comprises the risk arising from inadequate management decisions resulting from the failure to take a changing business environment into account.

Contagion risk is the possibility that adverse impacts occurring in other entities may have an impact on UNIQA Biztosító Zrt. or vice versa. Due to the fact that contagion risk can have many origins, there is no standardized approach on how to deal with contagion risk. First and foremost, getting an understanding for the correlation between the different types of risks is essential for identifying a potential contagion risk.

The most important reputational risks, as well as strategic risks are identified, assessed and reported similarly to operational risks. The risk management of UNIQA Biztosító Zrt. subsequently analyses whether the threat of an intragroup contagion is present.

Sustainability risks or ESG risks include risks related to the sustainability factors of environment, social/employee and governance (“ESG”). In line with the Group view, these risks are not considered as a separate risk category, but are taken into account as part of the existing risk categories.

## C.9 Any Other Information

No other disclosure is made on the risk profile.

## D. Valuation for Solvency Purposes

Methods stated in the Solvency II Directive and Delegated Acts are used for the derivation of the solvency balance sheet. They are based on the going concern-principle. Assets and liabilities are evaluated according to Art. 75. of the Solvency II Directive. Thereby, assets are valued at the value for which they can be exchanged between knowledgeable, willing business partners independent from each other. Wherever available, marked-to-market values are used for the valuation. In case they are not available, marked-to-model values are used. Liabilities are valued at the value that is used by knowledgeable and willing parties to transfer or meet them in the framework of a standard market transaction. In general, a marked-to-model approach that models future cash flows of the existing business is used for the valuation.

### Foreign currency conversion

For the revaluation of items denominated in foreign currencies in the solvency balance sheet the following exchange rates of the Hungarian National Bank are used during the reporting period:

HUF prices as of balance sheet date	
CHF	406.93
CZK	16.58
EUR	400.25
GBP	451.98
PLN	85.35
RON	80.88
USD	375.68

Table 29. Exchange Rates

### D.1 Assets

The following table shows the comparison between the evaluation of total assets according to Solvency II and Statutory values based on valuation date 31 December 2022.

Assets [ in Thousand HUF]		Solvency II	Statutory	Revaluation
1	Goodwill	n.a.	-	n.a.
2	Deferred acquisition costs	n.a.	5,256,733	n.a.
3	Intangible assets	-	1,100,158	- 1,100,158
4	Deferred tax assets	-	-	-
5	Pension benefit surplus	-	-	-
6	Property, plant & equipment (for own use)	1,598,035	950,432	647,603
7	Investments (except for assets for unit- and index-linked contracts)	32,011,337	40,772,092	- 8,760,756
7.1	Properties (except for own use)	-	-	-
7.2	Shares in affiliated companies, including participations	750,577	647,808	102,768
7.3	Shares	-	-	-
7.3.1	Shares - listed	-	-	-
7.3.2	Shares - not listed	-	-	-
7.4	Bonds	30,272,048	39,003,544	- 8,731,496
7.4.1	Government bonds	27,106,233	36,843,772	- 9,737,539
7.4.2	Corporate bonds	3,165,815	2,159,772	1,006,043
7.4.3	Structured debt securities	-	-	-
7.4.4	Asset backed securities	-	-	-
7.5	Undertakings for collective investment	981,204	1,120,740	- 139,536
7.6	Derivatives	7,507	-	7,507
7.7	Deposits except for cash equivalents	-	-	-
7.8	Other investments	-	-	-
7.9	Assets for unit- and index-linked contracts	126,777,484	127,302,408	- 524,924
8	Loans and mortgages	9,801	9,801	-
8.1	Policy loans	9,801	9,801	-
8.2	Loans and mortgages for private individuals	-	-	-
8.3	Other loans and mortgages	-	-	-
9	Recoverables from reinsurance contracts from:	10,141,530	19,690,887	- 9,549,357
9.1	Non-life insurances and health insurances similar to non-life	8,523,843	16,809,128	- 8,285,284
9.1.1	Non-life insurances except for health insurances	8,489,997	16,745,398	- 8,255,401
9.1.2	Health insurances similar to non-life	33,846	63,729	- 29,883
9.2	Life insurances and health insurances similar to life except for health insurances and unit- and index-linked insurances	1,617,686	2,881,759	- 1,264,073
9.2.1	Health insurance similar to life	44,979	34,982	9,997
9.2.2	Life insurance except for health insurance and unit- and index-linked insurances	1,572,707	2,846,777	- 1,274,070
9.3	Life insurances, unit- and index-linked	-	-	-
10	Deposit receivables	-	-	-
11	Receivables towards insurances and intermediaries	4,509,993	6,047,554	- 1,537,560
12	Reinsurance receivables	1,175,298	811,461	363,837
13	Receivables (trade, not insurance)	502,257	853,217	- 350,961
14	Own shares (held directly)	-	-	-
15	Contributions due regarding own-fund items or funds initially demanded but not yet deposited	-	-	-
16	Cash and cash equivalents	4,304,895	4,304,894	1
17	Other assets not reported elsewhere	2,605,023	3,106,652	- 501,629
	<b>Total assets</b>	<b>183,635,651</b>	<b>210,206,288</b>	<b>- 26,570,638</b>

Table 30. Assets based on valuation date 31 December 2022

The following asset classes are not classified as asset components of the UNIQA Biztosító Zrt. as at 31 December 2022 and were therefore not commented on:

- 1. Goodwill
- 5. Pension benefit surplus;
- 7.1 Properties (except for own use)
- 7.3 Shares
- 7.7 Deposits except for cash equivalents
- 7.8 Other investments
- 8.3 Other loans and mortgages
- 10. Deposit receivables

- 14. Own shares (held directly)
- 15. Contributions due regarding own-fund items or funds initially demanded but not yet deposited.

The following tables describe on an individual basis the basic principles, methods and key assumptions for each class of assets on which the valuation for solvency purposes is based and illustrates substantial differences, both quantitatively and qualitatively, for valuation in accordance with local GAAP in the annual financial statement.

#### Deferred acquisition costs

Assets [ in Thousand HUF]	Solvency II	Statutory Values	Revaluation
Deferred acquisition costs	n.a.	5,256,733	n.a.

Table 31. Deferred acquisition costs

Deferred acquisition costs include costs which occur within the underwriting of insurance risks and the selling of insurance contracts, especially at the time of conclusion of the contract.

Deferred acquisition costs are balanced in accordance with local GAAP. Thereby, in contracts of property and casualty insurance, accruals of the costs directly allocated to conclusion and an attribution over the anticipated contractual period or an attribution in accordance with the premium deficiency are made. In life insurance, deferred acquisition costs are amortized based on projections of estimated gross profits or gross margins. Deferred acquisition costs are to be valued at zero according to Solvency II, which leads to the difference in value.

#### Intangible Assets

Assets [ in Thousand HUF]	Solvency II	Statutory Values	Revaluation
Intangible assets	-	1,100,158	- 1,100,158

Table 32. Intangible assets

Intangible assets include self-developed data processing software acquired for consideration licences as well as copyrights. Amortization of intangible assets is done according to their economic lifetime over a fixed period.

Intangible assets can be scheduled for Solvency II purposes if they can be sold separately and if market values can be determined reliably. Since both criteria were not met, these assets were not set in the solvency balance sheet, which explains the difference in value.

#### Deferred Tax Assets

The method of calculating deferred tax assets is based on the provisions of IAS. Due to the time-limited differences between the valuation of assets and liabilities in the solvency balance sheet in accordance with Solvency II and the tax balance sheets, deferred tax assets and liabilities are set up for Solvency II purposes according to local tax regulations of UNIQA Biztosító Zrt.

The starting point of valuing deferred tax assets for solvency purposes is the value of deferred tax assets in the IFRS balance sheet. This value is further adjusted for the valuation differences between economic and IFRS values (hidden losses multiplied by the tax rate). An effective tax rate of 11,3 % has been estimated for the purpose of the latter adjustments. For losses carried forward, deferred tax assets are recognised if their future usability, according to internal forecast, is likely to be the case. The intrinsic value of deferred tax assets of temporary differences is reviewed at each balance sheet date.

Deferred tax assets are set up in the solvency balance sheet based on different valuations in the tax balance sheet and the solvency balance sheet.

Assets [ in Thousand HUF]	Solvency II	Statutory Values	Revaluation
Deferred tax assets	0	0	0

Table 33. Deferred tax assets

No deferred tax asset is calculated on reclassifications in order to avoid grossing up of deferred tax assets and liabilities.

#### Property, Plant and Equipment (for own use)

Assets [ in Thousand HUF]	Solvency II	Statutory Values	Revaluation
Property, plant & equipment (for own use)	1,598,035	950,432	647,603

Table 34. Property, plant and equipment (for own use)

Property, plant and equipment are measured at cost less accumulated depreciation and accumulated impairment losses. If parts of an item of property, plant and equipment have different useful lives, they are recognized as separate items (main components) of property, plant and equipment.

The company regularly evaluates the market value of the main investment categories and revalues them if the book value is estimated to be higher than the market value. Investments in rented properties are considered zero in SII, while the right-of-use asset is included in the SII under the IFRS16 leasing standard; these two effects cause the difference.

**Shares in affiliated companies including participations**

Assets [ in Thousand HUF]	Solvency II	Statutory Values	Revaluation
Shares in affiliated companies, including participations	750,577	647,808	102,768

Table 35. Shares in affiliated companies, including participations

Participations are listed at carrying value. Subsidiaries are entities controlled by the company. The company controls a subsidiary if

- the company is able to exercise power over the subsidiary in which investments are held
- it is exposed to fluctuating returns from its participation and
- it is able to influence the amount of the returns as a result of its power.

Under Solvency II, the proportionate net asset value (determined according to Solvency II valuation principles) must be used as an investment value, provided that no exchange rate exists, in accordance with Article 13 of the Level 2 Regulation.

If the valuation of individual assets and liabilities in accordance with Article 75 of Solvency II Directive is not practicable for calculating the excess of assets over liabilities for related undertakings other than insurance or reinsurance, the participating undertaking may consider the equity method as prescribed in IFRS to be consistent with Article 75 of Solvency II Directive. In this case, the value of goodwill and other intangible assets that would be valued at zero (Article 12(2) Delegated Regulation), shall be deducted from the Participating undertaking Subsidiary. This valuation method was used for Participations which are not fully consolidated or quoted at Group level (which are not relevant for the UNIQA Group consolidation).

Shares in affiliated companies, including participations in local financial reports are shown in original transaction cost, which explains the difference in value.

**Bonds**

Assets [ in Thousand HUF]	Solvency II	Statutory Values	Revaluation
<b>Bonds</b>	<b>30,272,048</b>	<b>39,003,544</b>	<b>8,731,496</b>
<i>Government bonds</i>	27,106,233	36,843,772	9,737,539
<i>Corporate bonds</i>	3,165,815	2,159,772	1,006,043
<i>Structured debt securities</i>	-	-	-
<i>Asset backed securities</i>	-	-	-

Table 36. Bonds

Under Solvency II bonds are listed at the current fair market value including accrued interest, which is established by using the official closing rate published by Bloomberg. Under Local GAAP bonds are measured at their purchase price not including accrued interests, value impaired if necessary. Under Local GAAP bonds held to maturity are amortized using the straight-line method, other bonds are

amortized using the effective-interest method: Disagio is shown under Any other assets, not elsewhere shown, whereas agio is shown under Any other liabilities, not elsewhere.

Bonds, for which a price quotation on an active market was present at the time of observation, have been recorded with the unaltered stock market or market price (mark-to-market). If no prices are quoted on active markets, the economic value was derived from comparable assets in consideration of a required adjustment of specific parameters (marking-to-market). If marking-to-market valuation was not possible, alternative valuation methods were used in the valuation (mark-to-model).

#### Undertakings for collective investment in securities

Assets [ in Thousand HUF]	Solvency II	Statutory Values		Revaluation
Undertakings for collective investment	981,204	1,120,740	-	139,536

Table 37. Undertakings for collective investment in securities

Investment funds are valued at the last available daily net asset value issued by the fund manager and in case of non-domestic, non-local currency investment funds, multiplied by the relevant exchange rate.

#### Derivatives

Derivatives held in the portfolio are OTC FX options. Under Solvency II their value is based on the latest available market value received by the option writer partner. In Local GAAP the derivatives are off-balance items, thus it is not shown among the assets.

#### Assets for Unit- and Index-Linked Contracts

Assets [ in Thousand HUF]	Solvency II	Statutory Values		Revaluation
Assets for unit- and index-linked contracts	126,777,484	127,302,408	-	524,924

Table 38. Assets for unit- and index-linked contracts

Assets for unit- and index-linked contracts are recognised for local financial statement as well as for the solvency balance sheet at the fair value. Due to the different observation dates for the local financial statements (30.12.2022) and Solvency II (31.12.2022) approaches are value differences.



**Loans and Mortgages**

Assets [ in Thousand HUF]	Solvency II	Statutory Values	Revaluation
<b>Loans and mortgages</b>	<b>9,801</b>	<b>9,801</b>	-
<i>Policy loans</i>	9,801	9,801	-
<i>Loans and mortgages for private individuals</i>	-	-	-
<i>Other loans and mortgages</i>	-	-	-

Table 39. Loans and mortgages

When recognised, such assets are measured at carrying value in the local GAAP balance sheet and Solvency II as well.

**Recoverables from reinsurance contracts**

Recoverables from reinsurance contracts [ in Thousand HUF]	Solvency II	Statutory Values	Revaluation
<b>Recoverables from reinsurance contracts</b>	<b>10,141,530</b>	<b>19,690,887</b>	<b>- 9,549,357</b>
Non-life insurances and health insurances similar to non-life	8,523,843	16,809,128	- 8,285,284
<i>Non-life insurances except for health insurances</i>	8,489,997	16,745,398	- 8,255,401
<i>Health insurances similar to non-life</i>	33,846	63,729	- 29,883
Life insurances and health insurances similar to life except for health insurances and unit- and index-linked insurances	1,617,686	2,881,759	- 1,264,073
<i>Health insurance similar to life</i>	44,979	34,982	9,997
<i>Life insurance except for health insurance and unit- and index-linked insurances</i>	1,572,707	2,846,777	- 1,274,070
Life insurances, unit- and index-linked	-	-	-

Table 40. Recoverables from reinsurance contracts

The item “Recoverables from reinsurance contracts“ includes the reinsurance share of technical provisions. According to the economic valuation approach of technical provisions under Solvency II, i.e. based on the discounted Best Estimate, future claims recovery cash flows from reinsurance counterparties less the expected future reinsurance premiums are recognised under reinsurance recoverables.

In the present Economic Balance Sheet, the following technical approaches have been used:

- Claims Provision recoverables, Non-Life and Health similar to non-life: Recoverables cash flows are calculated from the projected gross cash flows using gross-to-net proxy ratios, determined on the basis of the statutory amounts of claims provisions at a line-of-business granularity. An adjustment for counterparty default is applied following the simplified method described in Article 61 of Commission Delegated Regulation 2015/35.
- Premium Provision recoverables, Non-Life and Health similar to non-life: Recoverables cash flows are modelled in line with best estimate assumptions, including the modelling of reinsurance cash-flows based on the reinsurance model of UNIQA’s Partial Internal Model (PIM) Non-Life. The impact of proportional and non-proportional reinsurance agreements on future loss payments is thereby modelled in an explicit fashion. Apart from claims recoveries, reinsurance commissions and reinstatement premiums are included in the

recoverables cash flow. An adjustment for counterparty default is applied following the simplified method described in Article 61 of Commission Delegated Regulation 2015/35.

- Recoverables for Non-Life Annuities (included in the recoverables for Life technical provisions): Recoverables cash flows are calculated from the projected gross cash flows using gross-to-net proxy ratios, determined on the basis of the statutory amounts of claims provisions at a line-of-business granularity. An adjustment for counterparty default is applied following the simplified method described in Article 61 of Commission Delegated Regulation 2015/35.
- Recoverables, Life and Health SLT Business: Reinsurance recoverables for Life and Health SLT business are considered as of low materiality and are currently not modelled in the cash flow projection models. The only life reinsurance recoverables taken into account in the economic balance sheet are the reinsurers' share of the claims reserve, with the statutory amount being used as a proxy.

### Receivables towards insurances and intermediaries

Assets [ in Thousand HUF]	Solvency II	Statutory Values	Revaluation
Receivables towards insurances and intermediaries	4,509,993	6,047,554	- 1,537,560

Table 41. Receivables towards insurances and intermediaries

This item includes receivables towards insurances and intermediaries. The local GAAP amount is adjusted in the economic balance sheet for the cancellation provision, reflecting the expected economic impact of the impairment of insurance premium receivables. The difference also includes a reclassification due to the local GAAP from the position "Insurance & intermediaries payables".

### Reinsurance receivables

Assets [ in Thousand HUF]	Solvency II	Statutory Values	Revaluation
Reinsurance receivables	1,175,298	811,461	363,837

Table 42. Reinsurance receivables

This item includes receivables from reinsurers, which were not categorized in the item of deposit receivables. The local GAAP carrying amount is taken into account, adjusted in the economic balance sheet for the reinsurers' part of the cancellation provision, reflecting the expected write-back of reinsurance premiums due to the impairment of direct premium receivables.

**Receivables (trade, not insurance)**

Assets [ in Thousand HUF]	Solvency II	Statutory Values	Revaluation
Receivables (trade, not insurance)	502,257	853,217	- 350,961

Table 43. Receivables (trade, not insurance)

This item includes all receivables which do not derive from the insurance business. When recognised, such assets are measured at carrying value.

The difference is reclassified in the local GAAP to the position “Payables (trade, not insurance).”

**Cash and Cash Equivalents**

Assets [ in Thousand HUF]	Solvency II	Statutory Values	Revaluation
Cash and cash equivalents	4,304,895	4,304,894	1

Table 44. Cash and cash equivalents

Under this item credits at banks, cheques and cash balance are recognised. The valuation is achieved at an economic value which corresponds to the nominal value. There are minor rounding differences to Solvency II. Foreign currency cash balances are multiplied by the official exchange rates of the Central Bank of Hungary.

**Other Assets Not Reported Elsewhere**

Assets [ in Thousand HUF]	Solvency II	Statutory Values	Revaluation
Other assets not reported elsewhere	2,605,023	3,106,652	- 501,629

Table 45. Other Assets not reported elsewhere

Other assets include all assets which are not already contained in the other items of the asset side. For economic valuation purposes, the local GAAP items displayed in this position are cleaned of accrued investment revenue and of unrealised gains on the HTM bond portfolio (as the latter items are considered to be part of the market value of the respective investments).

**D.2 Technical Provisions**

Due to the type of liabilities, technical provisions of UNIQA Biztosító Zrt. are solely valued as “Best Estimate plus Risk Margin”. A replication of technical cash flows by means of financial instruments and thus a valuation in total are not considered.

The calculation of provisions, based on the Best Estimate, is a matter of revaluation of technical provisions in accordance with IFRS or local GAAP on an economic valuation. By the use of assumptions regarding the Best Estimate in the calculation of these future cash flows (instead of

cautious valuation assumptions), so called Best Estimate provisions or Best Estimate liabilities can be obtained. Options and guarantees (TVFOG), as far as they are relevant, are included in the Best Estimate of the provisions.

The following table shows the Solvency II provisions compared to the corresponding provisions in accordance with Local GAAP of UNIQA Biztosító Zrt. on 31.12.2022:

### Evaluation of Technical Provisions

Technical provisions [thousand HUF]		Solvency II	Statutory Values	Revaluation
<b>1</b>	<b>Technical provisions - non-life insurance</b>	<b>22,957,979</b>	<b>33,037,388</b>	<b>- 10,079,409</b>
1.1	Technical provisions - non-life insurance (except for health insurance)	22,355,268	31,481,236	- 9,125,967
1.1.1	<i>Technical provisions calculated in total</i>	-	<i>n.a.</i>	<i>n.a.</i>
1.1.2	<i>Best Estimate</i>	21,712,198	<i>n.a.</i>	<i>n.a.</i>
1.1.3	<i>Risk margin</i>	643,071	<i>n.a.</i>	<i>n.a.</i>
1.2	Technical provisions-health insurance (similar to non-life)	602,710	1,556,152	- 953,442
1.2.1	<i>Technical provisions calculated in total</i>	-	<i>n.a.</i>	<i>n.a.</i>
1.2.2	<i>Best Estimate</i>	582,751	<i>n.a.</i>	<i>n.a.</i>
1.2.3	<i>Risk margin</i>	19,960	<i>n.a.</i>	<i>n.a.</i>
<b>2</b>	<b>Technical provisions– life insurance (except for unit- and index-linked insurances)</b>	<b>8,336,140</b>	<b>12,569,409</b>	<b>- 4,233,269</b>
2.1	Technical provisions– health insurance (similar to life)	55,576	1,230,637	- 1,175,061
2.1.1	<i>Technical provisions calculated in total</i>	-	<i>n.a.</i>	<i>n.a.</i>
2.1.2	<i>Best Estimate</i>	51,022	<i>n.a.</i>	<i>n.a.</i>
2.1.3	<i>Risk margin</i>	4,553	<i>n.a.</i>	<i>n.a.</i>
2.2	Technical provisions – Life insurance (except for health insurance and unit- and index-linked insurances)	8,280,564	11,338,772	- 3,058,208
2.2.1	<i>Technical provisions calculated in total</i>	-	<i>n.a.</i>	<i>n.a.</i>
2.2.2	<i>Best Estimate</i>	7,979,441	<i>n.a.</i>	<i>n.a.</i>
2.2.3	<i>Risk margin</i>	301,123	<i>n.a.</i>	<i>n.a.</i>
<b>3</b>	<b>Technical provisions–unit- and index-linked insurances</b>	<b>116,086,978</b>	<b>128,830,603</b>	<b>- 12,743,625</b>
3.1	<i>Technical provisions calculated in total</i>	-	<i>n.a.</i>	<i>n.a.</i>
3.2	<i>Best Estimate</i>	113,998,831	<i>n.a.</i>	<i>n.a.</i>
3.3	<i>Risk margin</i>	2,088,147	<i>n.a.</i>	<i>n.a.</i>
<b>4</b>	<b>Other technical provision</b>	<b>n.a.</b>	<b>1,646,766</b>	<b>n.a.</b>
<b>Technical provisions in total</b>		<b>147,381,097</b>	<b>176,084,166</b>	<b>- 28,703,069</b>

Table 46. Evaluation of technical provisions

In the following paragraphs, the basic principles, methods and key assumptions, on which the evaluation for the solvency balance sheet is based, are described separately for technical provisions non-life and life. Furthermore, significant differences for the evaluation according to the local GAAP in the financial statement are quantitatively and qualitatively explained.

#### D.2.1 Technical Provisions Non-life

The methods used for the evaluation of the technical provisions are determined by the UNIQA Insurance Group AG and regulated in the UNIQA Group Best Estimate Standard non-life. This Group-standard is used in UNIQA Biztosító Zrt. in all lines of business of property and casualty insurance. The methods from non-life are used as well in health business which is practiced on a similar basis to that of a property and casualty insurance (Health- NSLT).

The methods chosen for the evaluation of technical provisions correspond to the current actuarial standards. Furthermore, they are selected in accordance with the materiality and complexity of the modelled risks.

In Solvency II the following parts of technical provisions are generally distinguished:

- Claims Reserve
- Premium Reserve
- Risk margin

In the calculation of the technical provisions all expenses that are also mentioned in Article 31 of the Delegated Acts are taken into account:

- Administrative expenses
- Investment management expenses
- Claims settlement expenses
- Acquisition expenses

The assumptions of future cost ratios within the cash flow projections are based on the planned expenses in the business plans of UNIQA Biztosító Zrt.

In order to evaluate each part, different methods are in place:

### Claims Reserve

The **homogeneous risk group (HRG)** structure for estimation of claims outstanding is defined taking into account the nature and the risk profile of the products. The HRG structure is harmonised with the locally used performance management and accounting aggregations. Reinsurance structure is the basis of the HRG structure, however the latter one is less granular. The HRG structure is reviewed once in year by Actuarial Department and the related Product Department.

Claims triangles per homogeneous risk group and also information on individual atypical claims in some cases form the basis for the valuation of reserves of claims that have not yet been settled. Generally acknowledged static methods are used for the evaluation of the Best Estimate (if applicable):

- Chain ladder;
- Munich chain ladder;
- Cape Cod; and
- Bornhuetter-Ferguson

These methods are available on yearly and quarterly basis and they are calculated with incurred and payment figures as well.

In case these methods are not suitable (e.g. for business divisions where only limited claims data are available), other Best-Practice methods (e.g. based on incidence of loss/extent of damage) are applied.

Salvage, subrogation and ALAEs are included in the basis data. Salvage and subrogations are included with adjustment for their expected recovery rate. Annuities are taken into account as a lump-sum in the non-life claims provision calculation.

Large claims are handled separately in industrial business where the largest claims typically occur. CAT claims are not marked in the best estimate calculation, they are estimated together with other claims.

To determine the discounted best-estimate reserves, the cash flow patterns are determined from the paid claims triangles using the appropriate curve fitting method. Three different methods are available

for modeller to choose the proper one or there is a possibility to use the historical cash flow pattern or make manual corrections. Undiscounted best estimate and cash flow patterns are reviewed by UNIQA Group actuaries.

### **Premium Reserve**

The Premium Provision calculation process is an integral part of the Partial Internal Model (PIM) calculation and is used also for the Standard Approach.

For the calculation of the premium provision, the following categories of premiums – and related obligations – are considered:

- unearned premium; and
- unaccepted premium (these provisions are estimated by modelling the cash flows within the contract boundaries and allowing for lapses)

Future premiums are considered within the contract boundary determined in accordance with Article 18 of Commission Delegated regulation 2015/35. In effect the contract boundary considered in non-life is the future date where the company has a unilateral right to terminate the contract. One-year and multi-year contracts are treated separately in the Premium Provision calculation. Lapses are distinguished from contract boundaries. Expected lapse rates, determined from historical experience, are used to adjust future premium cash flows.

Future claims are modelled consistently with PIM. Claims distributions are determined using the historical claims experience. Statistical goodness-of-fit criteria are used to select the most appropriate distributions for each segment. Expert judgement is used to supplement the data in those cases where sufficient historical experience is not available. The homogeneous risk group structure used for the Premium Provision calculation is more granular than the one used for Claims Provision, with the aim of closely reflecting the reinsurance structure. Three types of claims (attritional, large and CAT) are distinguished. Attritional claims are modelled via a total loss distribution, while a frequency-severity approach is used for the modelling of large claims. Catastrophe (CAT) claims are either derived from event sets generated by external natural catastrophe models. Payment patterns for future claims are determined separately by homogeneous risk group and claim type using triangle methods based on historical experience.

Operating expenses are modelled consistently with planning assumptions. Expected future acquisition cost, premium refund and insurance tax cash flows within the contract boundary are also included in the Premium Provision calculation.

### **Risk Margin**

The risk margin is calculated as the present value of all future costs of capital of hypothetical reference undertakings taking over the insurance obligations of the company, calculated with the Solvency 2 standard cost-of-capital rate of 6% per annum.

Following Level 2 (Implementing measures solvency 2) Article 38(1), it is assumed that a non-life reference undertaking takes over the obligations related to non-life activities. The reference undertakings are assumed to be empty before the hypothetical portfolio transfer. After the transfer, the reference undertakings raise eligible own funds equal to the SCR necessary to support the insurance obligations over their remaining lifetime. In line with Level 2 Article 38(1) it is also assumed that the reference undertakings do not take up new insurance obligations beyond the existing contract

boundaries (e.g. it is assumed that contracts are terminated at the first possible future date where the company has a unilateral right to terminate a contract).

The future SCR of the reference undertakings are approximated by scaling each relevant risk module (or submodule) proportionally to the projected value of the relevant risk driver(s).

### Degree of Uncertainty

The parameters and assumptions used for the calculation of technical provisions are subject to natural uncertainty due to possible variations in the benefits and costs, as well as economic assumptions such as discount rates.

As UNIQA built a Partial Internal Model to quantify its Non-Life underwriting risk, the full distribution of the underwriting results is available and is used to get an understanding about the volatility in the Best Estimate reserve.

### Overview of the BE as at Valuation Date 31.12.2022

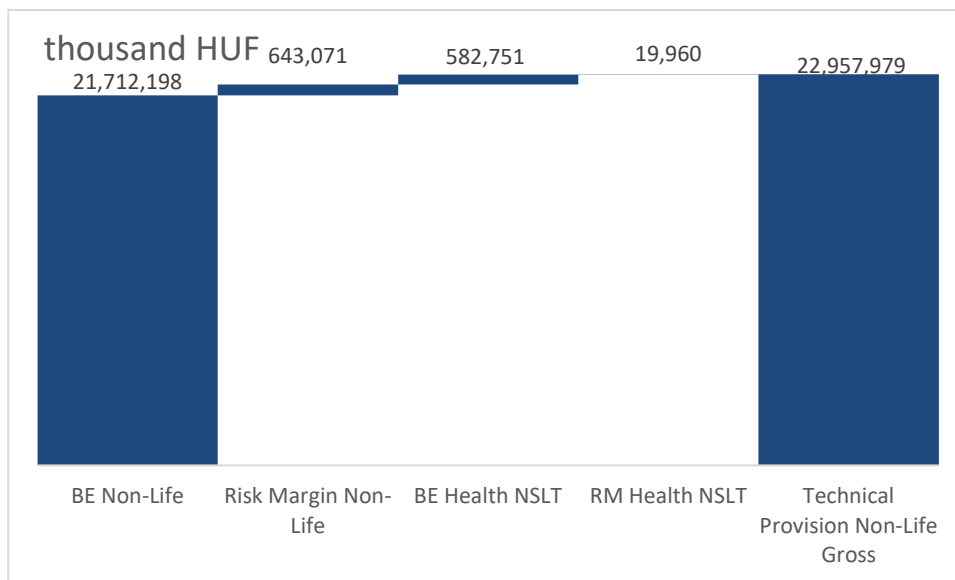


Figure 16. Technical provisions non-life & health-NSLT

The Best Estimate-reserves are mostly determined by claims reserves (CO), the premium reserve represents a smaller part. In order to calculate the technical provisions, no significant simplified methods were used. The same applies to the calculation of the risk margin.

### Reconciliation of Gross Technical Provisions Non-life & Health-NSLT to Local GAAP Balance Sheet

Technical provisions [thousand HUF]	Solvency II	Statutory Values	Revaluation
<b>Technical provisions – non-life insurance</b>	<b>22,957,979</b>	<b>33,037,388</b>	<b>- 10,079,409</b>
Technical provisions – non-life insurance (except for health insurance)	22,355,268	31,481,236	- 9,125,967
<i>Technical provisions calculated in total</i>	-	<i>n.a.</i>	<i>n.a.</i>
<i>Best Estimate</i>	<i>21,712,198</i>	<i>n.a.</i>	<i>n.a.</i>
<i>Risk margin</i>	<i>643,071</i>	<i>n.a.</i>	<i>n.a.</i>
Technical provisions – health insurance (similar to non-life)	602,710	1,556,152	- 953,442
<i>Technical provisions calculated in total</i>	-	<i>n.a.</i>	<i>n.a.</i>
<i>Best Estimate</i>	<i>582,751</i>	<i>n.a.</i>	<i>n.a.</i>
<i>Risk margin</i>	<i>19,960</i>	<i>n.a.</i>	<i>n.a.</i>

Table 47. Evaluation of gross technical provisions

In property and casualty insurance under Solvency II, the technical provisions are less valued than under local GAAP. The main reasons are:

- Claims reserves in Solvency II are shown as discounted, which has significant effect since there are high reserve stocks of long processing liability insurances.
- The unearned premium (UPR) represents in the accounting – in accordance with IFRS and the local GAAP - the equivalent to the premium provision's Best Estimate. Since not the whole UPR can be provisioned but a small part net of claims and fixed costs, there is a revaluation effect in Solvency II. Acquisition commissions are already paid, thus they are no longer considered in the cash flow.
- When it comes to the calculation of net liabilities, external reinsurance business are taken into consideration.

The following table compares the changes of Solvency II technical provisions between the last and current period.



Technical provisions [thousand HUF]	31/12/2021	31/12/2022	Difference
<b>Technical provisions – non-life insurance</b>	<b>21,996,374</b>	<b>22,957,979</b>	<b>961,605</b>
Technical provisions – non-life insurance (except for health insurance)	21,505,113	22,355,268	850,156
<i>Technical provisions calculated in total</i>	-	-	-
<i>Best Estimate</i>	<i>21,038,107</i>	<i>21,712,198</i>	<i>674,091</i>
<i>Risk margin</i>	<i>467,006</i>	<i>643,071</i>	<i>176,065</i>
Technical provisions – health insurance (similar to non-life)	491,261	602,710	111,449
<i>Technical provisions calculated in total</i>	-	-	-
<i>Best Estimate</i>	<i>414,299</i>	<i>582,751</i>	<i>168,452</i>
<i>Risk margin</i>	<i>76,962</i>	<i>19,960</i>	<i>- 57,003</i>

Table 48. Comparison of gross technical provisions

Technical Provisions increased during the year driven by growing Technical Provision Not revalued, where the Extraordinary Tax was shown. Moreover, the decrease of the Claims Provision caused by reserve release related to a Large Claim on the Fire Line of Business, which decrease is offset by the increase in the Premium Provision on the Other motor insurance Line of Business.

The following table shows the reconciliation of the Local GAAP values to Solvency II values per segment of the largest LoBs in non-life insurance:

Thousand HUF	Solvency II	Statutory Values	Revaluation
<b>Technical provisions – non-life insurance</b>	<b>22,957,979</b>	<b>33,037,388</b>	<b>-10,079,409</b>
<b>Motor vehicle liability insurance</b>	<b>9,420,543</b>	<b>12,608,917</b>	<b>-3,188,374</b>
<i>Technical provisions calculated as a whole</i>	<i>n.a.</i>	<i>12,608,917</i>	<i>n.a.</i>
<i>Best Estimate</i>	<i>9,072,873</i>	<i>n.a.</i>	<i>n.a.</i>
<i>Risk margin</i>	<i>347,671</i>	<i>n.a.</i>	<i>n.a.</i>
<b>Other motor insurance</b>	<b>5,034,367</b>	<b>5,361,313</b>	<b>-326,946</b>
<i>Technical provisions calculated as a whole</i>	<i>n.a.</i>	<i>5,361,313</i>	<i>n.a.</i>
<i>Best Estimate</i>	<i>4,931,900</i>	<i>n.a.</i>	<i>n.a.</i>
<i>Risk margin</i>	<i>102,467</i>	<i>n.a.</i>	<i>n.a.</i>
<b>Fire and other damage to property insurance</b>	<b>4,024,191</b>	<b>5,099,461</b>	<b>-1,075,270</b>
<i>Technical provisions calculated as a whole</i>	<i>n.a.</i>	<i>5,099,461</i>	<i>n.a.</i>
<i>Best Estimate</i>	<i>3,893,814</i>	<i>n.a.</i>	<i>n.a.</i>
<i>Risk margin</i>	<i>130,376</i>	<i>n.a.</i>	<i>n.a.</i>
<b>General liability insurance</b>	<b>1,770,904</b>	<b>3,847,226</b>	<b>-2,076,323</b>
<i>Technical provisions calculated as a whole</i>	<i>n.a.</i>	<i>3,847,226</i>	<i>n.a.</i>
<i>Best Estimate</i>	<i>1,735,995</i>	<i>n.a.</i>	<i>n.a.</i>
<i>Risk margin</i>	<i>34,909</i>	<i>n.a.</i>	<i>n.a.</i>

Table 49. Evaluation of technical provisions for largest Non-Life LoBs

The revaluation differences per Line of Business comes from the same reasons as already mentioned above for the company level. The largest effects being in the two longest tailed businesses, namely Motor vehicle liability and general liability.

## D.2.2 Technical Provisions Life & Health (SLT)

### Description of Methods to Evaluate Technical Provisions

A Best Estimate reserve can be interpreted as a statutory reserve net of all prudent assumptions.

Thus, the re-evaluation of reserves implies replacing prudent assumptions (e.g. mortality, expenses) by best estimate assumptions. Under the principle of equivalence a reserve in life insurance is defined as difference of present value of future benefits and present value of future premiums. Calculating those future cash flows using best estimate assumptions (instead of prudent assumptions stated in the technical note) leads to a reserve called Best Estimate reserve or Best Estimate Liability.

In case of Incurred but not reported (IBNR) and Reported but not settled (RBNS) claim reserve, Profit sharing reserve for group policies Best Estimate reserve is based on the Statutory Reserve and discounting is applied.

#### ***Unit-Linked Business (UL)***

A deterministic projection model is used. Insurance products are reflected in the model as homogeneous risk groups and each model point corresponds to a single policy or a part of it. Investment return (unit growth) assumptions are consistent with the risk-free forward reference rates. Nearly all unit-linked policies are covered by the projection; a scaling factor based on unit reserves is applied to account for the marginal gap in the model coverage.

#### ***Traditional Business with Profit Sharing (WP)***

A deterministic projection model is used. Insurance products are reflected in the model as homogeneous risk groups and each model point corresponds to a single policy or a part of it. Investment assumptions are consistent with the risk-free forward reference rates. Some products are not covered by the projection; a scaling factor based on statutory reserves is applied for the rest to account for the small gap in the model coverage.

#### ***Traditional Business without Profit Sharing (WoP)***

A deterministic projection model is used. Insurance products are reflected in the model as homogeneous risk groups and each model point corresponds to a single policy or a part of it. Since 12.31.2019 the Funeral products are also modelled within this Line of Business, which are similar to the term life products in their main characteristics. The projection model does not have full coverage; the best estimate of those products that are currently out of the model scope is approximated by the statutory (Solvency 1) reserves.

#### ***Health SLT (HSLT)***

A deterministic projection model is used. Insurance products are reflected in the model as homogeneous risk groups and each model point corresponds to a single policy or a part of it. The projection model does have full coverage.

#### ***Non-Life Annuities***

The best estimate of non-life annuities is calculated by a cash-flow model. Mortality rates are taken from the 2016 Hungarian mortality table. The cash flow model includes an expense loading and an indexation assumption.

### Assumptions

The assumptions relating to the Best Estimate are determined on the basis of the past, present and expected development and includes also other relevant data. The best estimate assumptions are used

for a number of purposes including Liability Adequacy Testing (LAT), IFRS17 and Embedded Value (EV) reporting. These assumptions are reviewed and updated annually and they are considered separately for each product group.

### ***Profit Participation***

The Company allocates a percentage of the earned interest over the guaranteed technical interest rate to each policyholder. The percentage is determined in the products terms and conditions. Regarding currently existing products it is either 80%, 85% or 90%. For the purpose of Best Estimates the actual percentage was used per product. Declared bonuses are treated in one of three possible ways, depending on the product. The three product groups with respect to profit sharing are: Increase of Sum Assured, Revalorization and Profit Account. These are treated separately in the Cash-Flow model according to the product terms and conditions.

### ***Costs***

Cost assumptions are based on the actual costs that are incurred in the years before the valuation date and the planned cost figures for the next calendar year. The allocation of expenses between initial and renewal expense assumptions reflects the reality. The allocation of expenses is differentiated by product class and between regular and single premium contracts.

Extraordinary costs, which are not expected in the future, are not included in the cost allocation. Additional costs are included in the allocation of costs in the event they are expected in the future.

Maintenance expenses are derived from planned figures which are based on the company total actual expenses adjusted. The cost amount of group, term and rider subportfolios are calculated using a premium based ratio. The traditional WP and UL portfolio are calculated using premium based and reserves based ratio and unit cost.

Future inflation is applied to modelled expenses in line with the inflation rates projected by the Central Bank of Hungary.

### ***Cancellation***

Lapse rates are based on an analysis of historic lapse rates, in particular on the average of the experienced lapse rates of the past years. For new products the lapse rates are based on the assumptions for similar products.

The used lapse and paid-up rates are based on the previous years' lapse experience. The analysis was carried out based on number of policies.

Lapse rates are derived independently for sales channel, premium frequency, product type, technical interest rate (just in case of traditional products) and policy year. Paid-up rates are modelled as dependent on sales channel, product type and policy year. For segments with too few data we made the estimations on an aggregated basis (i.e. all premium frequencies together, technical interest rates together, etc.).

We built up "run-off" triangles of policy lapses based on policy beginning year and policy age and used expert judgement for extrapolation. With the "run-off" triangle approach we were able to take into consideration calendar year effects (e.g.: loan payback effect at end of 2011), policy start year effects (poor or dynamic sales activity, etc.).

**Commission**

The estimates of the commission are based on the commission agreements in force with sales partners.

**Mortality and Disability**

The assumptions of mortality and disability are based on the Best Estimate for future events. The developments from the past are therefore taken into account. If this information should not be enough, developments from the sector will be used as well.

**Interest Rate Assumptions**

The interest rate assumptions, in the calculation of the reserves for the Best Estimate, are derived under Solvency II on the basis of the given risk-free interest rates. The interest rate assumptions have the strongest influence on the value of the Best Estimate reserves in the traditional life insurance business. The interest rate assumptions as of 31 December 2022 are as follows:

**Risk-free interest rates 2022 (excl.  
Volatility Adjustment)**

Year	EUR	HUF
1	3.18%	13.66%
5	3.13%	9.67%
10	3.09%	8.61%
15	3.02%	8.51%
20	2.77%	8.04%
25	2.70%	7.56%

Table 50. Interest rate assumptions

**Risk Margin**

The risk margin is calculated as the present value of all future capital costs. Thereby the future SCRs are updated analogously to the processing of the Best Estimate. Furthermore, the capital costs of 6 per cent are fixed. It is assumed that all market risks are hedgeable.

Following Level 2 Article 38(1), it is assumed that a life reference undertaking takes over the obligations relating to life activities. The reference undertakings are assumed to be empty before the hypothetical portfolio transfer. After the transfer, the reference undertakings raise eligible own funds equal to the SCR necessary to support the insurance obligations over their remaining lifetime. In line with Level 2 Article 38(1) it is also assumed that the reference undertakings do not take up new insurance obligations beyond the existing contract boundaries (e.g. it is assumed that contracts are terminated at the first possible future date where the company has a unilateral right to terminate a contract).

UNIQA uses an approach that calculates the future SCRs via their risk drivers. An example for a risk driver would be the trend of administrative costs in comparison to the development figure of the cost of risk capital. The risk margin is calculated on a net basis after deduction of reinsurance.

**Degree of Uncertainty**

The degree of uncertainty of technical provisions is reviewed within the scope of the Embedded Value (EV) account or within the analysis of change. In the analyses of the change the observed parameters

are compared with the assumptions in the projection. If the development of the technical provisions can be explained with observed parameters, this means that all relevant risks are adequately depicted.

In the analyses of the change, it is shown particularly how realized events, in comparison with initially assumed parameters, affect the value of technical provisions under Solvency II.

**Overview of the BE as at Valuation Date 31.12.2022**

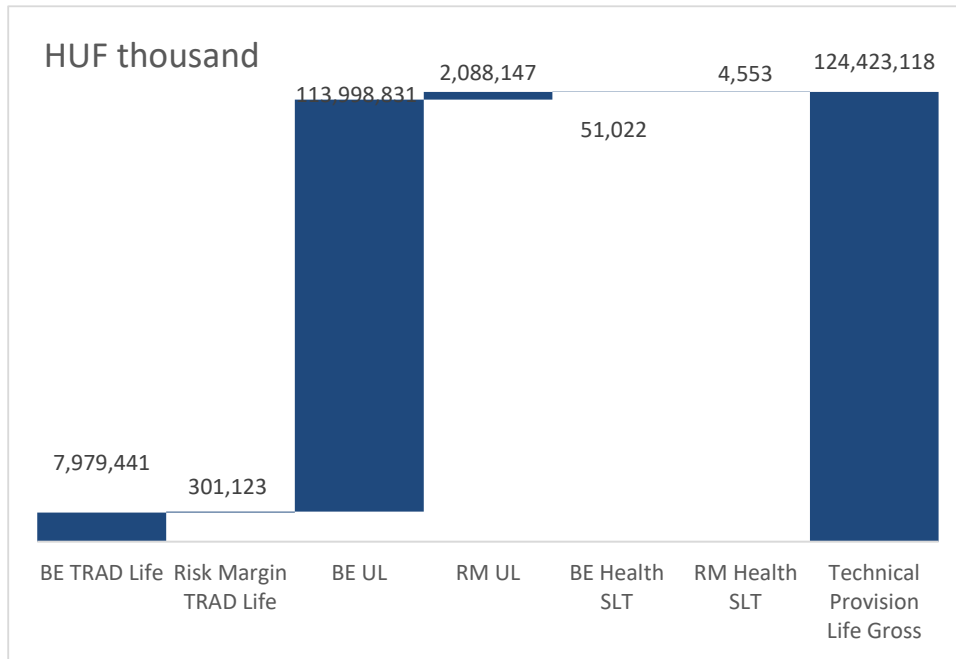


Figure 17. Technical provisions Life & health (SLT) (in THUF)

In order to calculate the technical provisions no significant simplified methods were used. The same applies to the calculation of the risk margin.

**Reconciliation of Gross Technical Provisions to Local GAAP Balance Sheet**

<b>Technical provisions [thousand HUF]</b>	Solvency II	Statutory Values	Revaluation
<b>Technical provisions– life insurance (except for unit- and index-linked insurances)</b>	<b>8,336,140</b>	<b>12,569,409</b>	<b>- 4,233,269</b>
Technical provisions– health insurance (similar to life)	55,576	1,230,637	- 1,175,061
<i>Technical provisions calculated in total</i>	-	<i>n.a.</i>	<i>n.a.</i>
<i>Best Estimate</i>	<i>51,022</i>	<i>n.a.</i>	<i>n.a.</i>
<i>Risk margin</i>	<i>4,553</i>	<i>n.a.</i>	<i>n.a.</i>
Technical provisions – Life insurance (except for health insurance and unit- and index-linked insurances)	8,280,564	11,338,772	- 3,058,208
<i>Technical provisions calculated in total</i>	-	<i>n.a.</i>	<i>n.a.</i>
<i>Best Estimate</i>	<i>7,979,441</i>	<i>n.a.</i>	<i>n.a.</i>
<i>Risk margin</i>	<i>301,123</i>	<i>n.a.</i>	<i>n.a.</i>
<b>Technical provisions–unit- and index-linked insurances</b>	<b>116,086,978</b>	<b>128,830,603</b>	<b>- 12,743,625</b>
<i>Technical provisions calculated in total</i>	-	<i>n.a.</i>	<i>n.a.</i>
<i>Best Estimate</i>	<i>113,998,831</i>	<i>n.a.</i>	<i>n.a.</i>
<i>Risk margin</i>	<i>2,088,147</i>	<i>n.a.</i>	<i>n.a.</i>
<b>Other technical provision</b>	<b>n.a.</b>	<b>1,646,766</b>	<b>n.a.</b>

Table 51. Evaluation of gross technical provisions - Life

In the Traditional Life business (without health and index- and unit-linked business) the Technical Provisions under Solvency II, compared to Local GAAP, are lower on Company level. This is driven on one hand by the effect of discounting and on the other hand prudent assumptions in statutory provisions. It should also be taken into account that under Solvency II future profit participation (in comparison with Local GAAP) is a part of the provision.

For the unit- and index-linked business, which has much lower interest sensitivity, provisions in the solvency balance sheet under Solvency II are smaller than those under Local GAAP by a large margin. This is driven by the expected future profits recognized in the Technical Provisions.

The effect of revaluation of Local GAAP to Solvency II in the health insurance business (HSLT) leads to a reduction of technical provisions mainly because contract boundary is set to next policy's anniversary. Cash flows after this moment are not taken into account under Solvency II Best estimation calculation.

The following table compares the changes of Solvency II technical provisions between the last and current period.

<b>Technical provisions [thousand HUF]</b>	31/12/2021	31/12/2022	Difference
<b>Technical provisions– life insurance (except for unit- and index-linked insurances)</b>	<b>10,254,579</b>	<b>8,336,140</b>	<b>- 1,918,439</b>
Technical provisions– health insurance (similar to life)	24,679	55,576	30,896
<i>Technical provisions calculated in total</i>	-	-	-
<i>Best Estimate</i>	19,876	51,022	31,146
<i>Risk margin</i>	4,803	4,553	- 250
Technical provisions – Life insurance (except for health insurance and unit- and index-linked insurances)	10,229,900	8,280,564	- 1,949,335
<i>Technical provisions calculated in total</i>	-	-	-
<i>Best Estimate</i>	9,823,398	7,979,441	- 1,843,957
<i>Risk margin</i>	406,502	301,123	- 105,378
<b>Technical provisions–unit- and index-linked insurances</b>	<b>122,159,313</b>	<b>116,086,978</b>	<b>- 6,072,334</b>
<i>Technical provisions calculated in total</i>	-	-	-
<i>Best Estimate</i>	119,348,407	113,998,831	- 5,349,575
<i>Risk margin</i>	2,810,906	2,088,147	- 722,759
<b>Other technical provision</b>	<b>n.a.</b>	<b>n.a.</b>	

Table 52. Comparison of gross technical provisions

The technical provisions decreased for unit- and index-linked insurances due to negative accrued yield in 2022.

### Transitional Measures

The volatility adjustment, as defined in Article 77d SII Directive 2009/138/EC, was adapted in the Solvency II calculation for all lines of business. No matching adjustment or transitional discounting rates have been used.

The volatility adjustment is additionally added to the risk-free interest curve. In the following table, the effect of the volatility adjustment is shown:

In Thousand HUF	With volatility adjustment	Without volatility adjustment and without other transitional measures	Effect
Technical provisions	147,381,097	147,397,352	- 16,255
Basic own funds	23,515,166	23,531,583	- 16,417
Eligible own funds to meet Solvency Capital Requirement	23,515,166	23,531,583	- 16,417
SCR	16,934,247	16,771,765	162,483
Eligible own funds to meet Minimum Capital Requirement	18,568,334	18,585,356	- 17,022
Minimum Capital Requirement	5,025,248	5,028,276	- 3,028

Table 53. Technical provisions Life – Non-Life - Health (volatility adjustment)

Besides the volatility adjustment no other significant transition measures were used for the calculation of the technical provision.

### D.3 Other Liabilities

The following table shows a comparison of all other liabilities at the reporting date 31.12.2022, valued in accordance with Solvency II and Local GAAP.

	Other liabilities [in Thousand HUF]	Solvency II	Statutory Values	Revaluation
1	Contingent liabilities	-	-	-
2	Provisions other than technical provisions	240,150	240,150	-
3	Pension benefit obligations	-	-	-
4	Deposits from reinsurers	42,462	89,513	- 47,051
5	Deferred tax liabilities	438,750	-	438,750
6	Derivatives	-	-	-
7	Debts owed to credit institutions	-	-	-
8	Financial liabilities other than debts owed to credit institutions	810,178	-	810,178
9	Insurance & intermediaries payables	5,390,981	5,347,139	43,842
10	Reinsurance payables	2,188,383	2,141,332	47,051
11	Payables (trade, not insurance)	2,141,315	2,492,276	- 350,961
12	Subordinated liabilities	5,951,882	6,003,750	- 51,868
12.1	<i>Subordinated liabilities not in BOF</i>	-	-	-
12.2	<i>Subordinated liabilities in BOF</i>	5,951,882	6,003,750	- 51,868
13	Any other liabilities, not elsewhere shown	1,487,168	5,182,247	- 3,695,079
	<b>Other liabilities total</b>	<b>18,691,269</b>	<b>21,496,407</b>	<b>- 2,805,138</b>

Table 54. Other liabilities

The following classes of assets are not available at the reporting date 31.12.2022 and will not be further commented:

- Contingent liabilities;
- Pension benefit obligations
- Derivatives
- Debts owed to credit institutions



**Provisions other than technical provisions**

Other liabilities [in Thousand HUF]	Solvency II	Statutory Values	Revaluation
Provisions other than technical provisions	240,150	240,150	-

Table 55. Provisions other than technical provisions

**Deposits from reinsurers****Deposits from reinsurers**

Other liabilities [in Thousand HUF]	Solvency II	Statutory Values	Revaluation
Deposits from reinsurers	42,462	89,513	- 47,051

Table 56. Deposit from reinsurers

Both for the local GAAP and for the solvency balance sheet, liabilities are valued at the settlement amount. As the same approach is applied under Solvency II, there are no valuation differences.

The difference is reclassified in Solvency II on the position “Reinsurance payables”, in the local GAAP on the position “Deposits from reinsurers”.

**Deferred tax liabilities**

Other liabilities [in Thousand HUF]	Solvency II	Statutory Values	Revaluation
Deferred tax liabilities	438,750	-	438,750

Table 57. Deferred tax liabilities

The starting point of valuing deferred tax liabilities for solvency purposes is the value of deferred tax liabilities in the consolidated IFRS balance sheet. This value is further adjusted for the valuation differences between economic and IFRS values (hidden reserves multiplied by the tax rate). An effective tax rate of 11,3% has been estimated for the purpose of the latter adjustments.

**Financial liabilities other than debts owed to credit institutions**

[ in Thousand HUF]	Solvency II	Statutory Values	Revaluation
Financial liabilities other than debts owed to credit institutions	810,178	-	810,178

A lease liability under IFRS16 leasing standard is recognised in the SII, but not in local accounting standards.

**Insurance & intermediaries payables**

Other liabilities [in Thousand HUF]	Solvency II	Statutory Values	Revaluation
Insurance & intermediaries payables	5,390,981	5,347,139	43,842

Table 58. Liabilities to insurance companies and agents

This item includes liabilities payable to insurance companies and intermediaries. Both for the local GAAP financial statements and for the solvency balance sheet liabilities are valued at the settlement amount. The difference is reclassified in the local GAAP to the position “Insurance and intermediaries receivables”.

**Reinsurance payables**

Other liabilities [in Thousand HUF]	Solvency II	Statutory Values	Revaluation
Reinsurance payables	2,188,383	2,141,332	47,051

Table 59. Reinsurance payables

This item includes reinsurance payables. Both for the local GAAP and for the solvency balance sheet liabilities are measured at carrying value. The difference is reclassified in the local GAAP to the position “Deposits from reinsurers”.

**Payables (trade, not insurance)**

Other liabilities [in Thousand HUF]	Solvency II	Statutory Values	Revaluation
Payables (trade, not insurance)	2,141,315	2,492,276	- 350,961

Table 60. Payables (trade, not insurance)

This item includes liabilities, which cannot be assigned to other categories. Both for the local GAAP and for the solvency balance sheet, liabilities are measured at carrying value. As the same approach is applied under Solvency II, there are no valuation differences.

The difference is reclassified in the local GAAP to the position “Receivables (trade, not insurance)”.

**Any other liabilities, not elsewhere shown**

Other liabilities [in Thousand HUF]	Solvency II	Statutory Values	Revaluation
Any other liabilities, not elsewhere shown	1,487,168	5,182,247	- 3,695,079

Table 61. Any other liabilities, not elsewhere shown

This item includes any other liabilities that are not shown elsewhere. This item includes miscellaneous payables e.g. tax and social security that are not related to insurance technical accounts.

These liabilities include accrued expenses valued at the local GAAP amount, cleaned of the reinsurance share of deferred acquisition costs and of unrealised losses on the HTM bond portfolio. There is also a difference in the accrued interest on subordinated loan capital, which in the case of the Solvency II Directive has been shown under subordinated loan capital.

#### **D.4 Alternative Methods for Valuation**

UNIQA Biztosító Zrt. uses no alternative methods for valuation.

#### **D.5 Any Other Information**

UNIQA Biztosító Zrt. has no further information to disclose related to the valuation used for solvency purposes.

## E. Capital Management

### E.1 Own Funds

This chapter contains information about own funds and the management of it. One of the most important targets of the top management is to be well capitalized over the time and to have enough own funds in place to manage large losses and negative financial business events.

Through active own fund management, UNIQA Biztosító Zrt. assures that the company's capitalisation is always adequate. There have to be sufficient available own funds in order to correspond to the capital requirements which have been calculated using the standard formula according to the requirements of the Supervisory Authority under Solvency II.

Furthermore, the management of own funds pursues the goal to increase UNIQA Biztosító Zrt.'s financial capability as much as possible and to keep it at a justifiable level at a target solvency ratio of 150% per cent defined in the company's Risk Strategy for 2022.

As long as strategic planning and capital strength allow for it, (taking into account MNB recommendations) UNIQA Biztosító Zrt. returns non-used capital in the form of dividends to its shareholders.

The overall solvency is regularly monitored in order to correspond to the overall solvency requirement.

A solvency ratio limit and capital requirement system with thresholds defines measures and escalation levels to be taken, if capitalisation falls below a certain level. This process guarantees that every time there is adequate and optimal own funds level to run the business.

The planning of the capital management activities and the overall solvency requirement for the internal risk model (ORSA, pillar 2) is based on a time horizon of 5 years.

Furthermore, UNIQA implemented the following processes for the management of own funds:

- The excess of assets over liabilities including own funds inside or outside the IFRS financial statements is monitored regularly.
- This comprises different categories of own funds ("tiers") in accordance with Solvency II in order to oppose the overall solvency requirement to the available own funds.
- Consequently, a possible adaptation need to meet the regulatory own funds requirements can be reviewed regularly.

In the reporting period, no major changes in connection to the management of own funds were carried out.

#### **Classification of own funds in categories**

In accordance with Solvency II, own funds, which differ in their capacity to absorb losses, are classified in categories, so-called Tiers. This varying capacity to absorb losses is shown in Figure 18. The loss absorbing capacity of Tier 1 own funds is estimated higher than that of Tier 2 and Tier 3 own funds respectively.

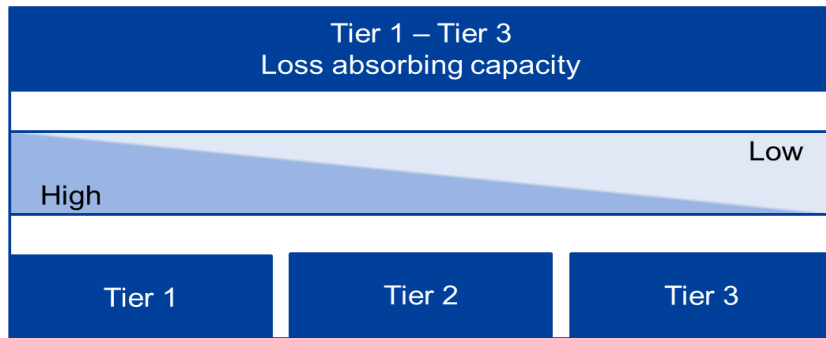


Figure 18. Loss absorbing capacity of own funds

As will be shown in the course of this section, UNIQA Biztosító Zrt. does not possess Tier 3 own funds. Figure 19 represents the relevant quality criteria for the respective own fund categories.

Quality criteria	Tier 1 restricted	Tier 2	Additional Tier 2
Capacity to absorb losses	Capacity to absorb losses in Going concern and winding-up	Capacity to absorb losses at least in winding-up	Capacity to absorb losses at least in winding-up
Maturity period	Unlimited maturity period; first contractual possibility to redeem or pay back at the earliest 5 years after issue	Unlimited or	Unlimited or initial maturity period of at least 5 years
Subordination ranking	Equal or preferential to the share capital or foundation funds respectively, subordinate to Tier 2- and Tier 3-basic own fund components, as well as to claims of all policy holders and entitled beneficiaries and non-subordinate creditors	Subordinate to all claims of all policy holders, entitled beneficiaries and non-subordinate creditors	Subordinate to all claims of all policy holders, entitled beneficiaries and non-subordinate creditors

Figure 19. Quality criteria per tier relevant to UNIQA Biztosító Zrt.

### Reconciliation of local GAAP equity to regulatory own funds

Position [in Thousand HUF]	2022
<b>Local GAAP equity incl. own shares</b>	<b>12,625,716</b>
Revaluation of assets	- 26,570,638
<i>Goodwill</i>	<i>n.a.</i>
<i>Deferred acquisition costs</i>	<i>n.a.</i>
<i>Participations</i>	102,768
<i>Real estate</i>	647,603
Loans	-
<i>Others</i>	- 27,321,009
<i>Revaluation of technical provision</i>	- 14,312,678
Technical provision non-life and Health similar to NL	- 10,079,409
Technical provision life & health similar to Life	- 4,233,269
Other technical provision	<i>n.a.</i>
<i>Revaluation of other provisions</i>	- 2,805,138
Deferred tax liabilities	438,750
Other	- 3,243,888
<b>Economic own funds</b>	<b>23,515,166</b>
Planned Dividend	-
Tier 1 - Restricted	,
Tier 2	5,951,882
<b>Basis own funds</b>	<b>23,515,166</b>

Table 62. Reconciliation of local GAAP equity to regulatory own funds

The essential drivers for the significantly higher own funds according to Solvency II compared to local GAAP equity are the following:

- Intangible assets are evaluated at zero in the solvency balance sheet.
- Deferred acquisition costs are evaluated at zero in the solvency balance sheet.
- Local GAAP values of participations, replaced by market values that are significantly higher on the valuation date.

- Technical provisions and reinsurance receivables are significantly higher evaluated in the regulatory own funds than according to the local GAAP. This is because they are evaluated on the basis of the discounted Best Estimate that includes a risk margin.

### Information on own funds

Position [in Thousand HUF]	2022
<b>Basic own funds</b>	<b>23,515,166</b>
Tier 1	17,563,284
Core capital	8,685,082
Other posts	1,758,120
Planned dividends	-
<i>Revaluation reserve according to IAS 39</i>	- 7,120,082
<i>Reconciliation reserve</i>	8,878,202
<i>Tier 1 Restricted – subordinated liabilities</i>	-
Tier 2 – Subordinated liabilities	5,951,882
Tier 3 –Deferred tax assets	-
Reduction due to tiering limits	-
Own funds for coverage of SCR	23,515,166

Table 63. Information on own funds

According to Solvency II requirements, there are defined limits for whether or not the various tiers are eligible. Tier 1 own funds are of the highest quality and can therefore be used entirely to cover the regulatory capital requirements. In the current reporting period, the composition of own funds is extended by a Tier 2 capital to strengthen the undertaking's solvency position above the level according to the Regulator's guideline.

Table 64 shows the capital quality of UNIQA Biztosító Zrt. as at 31 December 2022 and the portion that can be used to cover the solvency requirement of UNIQA Biztosító Zrt.. Within UNIQA Biztosító Zrt., regulatory own funds consist mainly of Tier 1 capital (capital of the highest quality) that may be used entirely to cover the capital requirement and a smaller amount of Tier2 capital.

Position	in Thousand HUF	in %
Tier 1	17,563,284	75%
Tier 1 Restricted	-	0%
Tier 2	5,951,882	25%
<b>Total</b>	<b>23,515,166</b>	

Table 64. Own funds in the reporting period

### Eligible own funds (coverage of SCR and MCR per Tier)

Under Solvency II, there are the following limitations which have been taken into account for the imputation of available own funds on the capital requirement (SCR/MCR). In accordance with the

Delegated Regulation concerning the determination of eligible own funds for the coverage of the capital requirements, UNIQA Biztosító uses the following limitations:

Coverage of SCR and MCR per Tier	Limitation [per cent]	Limitation [in Thousand HUF]
<b>SCR-Coverage</b>		
Tier 1	Min. 50% of SCR	8,467,124
Tier 1 Restricted	Max. 20% of the total Tier 1	-
Tier 3	Max. 15% of SCR	2,540,137
Tier 2 + Tier 3	Max. 50% of SCR	8,467,124
<b>MCR-Coverage</b>		
Tier 1	Min. 80% of MCR	4,127,399
Tier 1 Restricted	Max. 20% of the total Tier 1	-
Tier 2	Max. 20% of MCR	1,031,850

Table 65. Eligible own funds (general)

The following table shows the eligible own funds of UNIQA Biztosító Zrt. for SCR and MCR of available own funds as at 31 December 2022. On the valuation date, no additional own funds existed.

Components of own funds [ in Thousand HUF]	Total	Tier 1 unrestricted	Tier 1 restricted	Tier 2	Tier 3
Basic own funds	23,515,166	17,563,284	-	5,951,882	-
Eligible own funds to cover SCR	23,515,166	17,563,284	-	5,951,882	-
Eligible own funds to cover MCR	18,595,134	17,563,284	-	1,031,850	-

Table 66. Eligible own funds as at 31 December 2022

Despite the quota which has to be calculated in the framework of Solvency II and that is indicated in the quantitative reporting template [QRT] S.23.01, UNIQA Biztosító Zrt. does not use any other supplementary quotas.

## E.2 Solvency Capital Requirement and Minimum Capital Requirement

For calculating the solvency capital requirement (SCR), UNIQA Biztosító Zrt. uses a partial internal model integrated into the standard formula. The partial internal model covers non-life underwriting risk and health underwriting risk similar to non-life (NSLT). The calculation of the solvency capital requirement is carried out in accordance with the applicable Solvency II regulations and assumes that business activities are continued on a going-concern basis. The solvency capital requirement is calibrated so as to ensure that all quantifiable risks UNIQA Biztosító Zrt. is exposed to are taken into account. This covers not only existing business but also new business expected to be written over the following twelve months. With respect to existing business, the solvency capital requirement covers only unexpected losses.

The solvency capital requirement corresponds to the value at risk of the basic own funds at a 99.5 per cent confidence level over a one-year period, meaning that it represents an amount of loss whose probability of occurrence over a one-year period is 1 in 200.

The following overview shows the solvency and minimum capital requirement at the end of the reporting period on the valuation date of 31 December 2022, as well as the own funds eligible to meet each capital requirement.



In Thousand HUF	2022
Eligible own funds to meet Solvency Capital Requirement	23,515,166
Solvency Capital Requirement (SCR)	16,934,247
Eligible basic own funds to meet Minimum Capital Requirement	18,595,134
Minimum Capital Requirement (MCR)	5,159,248

Table 67. Solvency and minimum capital requirement and own funds

The detailed breakdown of the solvency capital requirement by risk modules is described in Section C on the risk profile. The non-life and health NSLT underwriting risk module has been calculated by the partial internal model, while all other risk modules have been calculated by the standard formula. Simplified calculations have been used for the calculation of the following modules and sub-modules:

- life mortality risk (for part of the portfolio), according to Article 91 of Delegated Regulation (EU) 2015/35
- life disability-morbidity risk (for part of the portfolio), according to Article 93 of Delegated Regulation (EU) 2015/35
- life expense risk (for part of the portfolio), according to Article 94 of Delegated Regulation (EU) 2015/35
- life catastrophe risk (for part of the portfolio), according to Article 96 of Delegated Regulation (EU) 2015/35

UNIQA Biztosító Zrt. does not use undertaking-specific parameters for calculating the solvency capital requirement.

No capital add-on is applied to the solvency capital requirement of UNIQA Biztosító Zrt.

The minimum capital requirement corresponds to an amount of eligible basic own funds below which policyholders and beneficiaries are exposed to an unacceptable risk if an undertaking were allowed to continue its operations. It is calculated by a linear function of technical provisions, written premiums and capital-at-risk. It shall neither fall below 25% nor exceed 45% of the solvency capital requirement. It is subject to an absolute floor defined in Article 129(1) of Directive 2009/138/EC. The minimum capital requirement is calculated according to the detailed rules set out by Articles 248–253 of Delegated Regulation (EU) 2015/35.

Information about the inputs of the calculation of the minimum capital requirement of UNIQA Biztosító Zrt. as at the end of 2022 is displayed in the table below.

Non-life linear formula inputs	Non-life activities		Life activities	
	Net best estimate and TP calculated as a whole	Net written premiums in the last 12 months	Net best estimate and TP calculated as a whole	Net written premiums in the last 12 months
Medical expense	-	-	-	-
Income protection	548,905	3,805,813	-	-
Workers' compensation	-	-	-	-
Motor vehicle liability	5,126,592	7,730,970	-	-
Other motor	3,050,035	7,625,886	-	-
Marine, aviation and transport	100,373	266,533	-	-
Fire and other damage to property	2,560,010	5,165,939	-	-
General liability	1,119,098	688,896	-	-
Credit and suretyship	-	-	-	-
Legal expenses	9,492	11,815	-	-
Assistance and proportional reinsurance	207,775	576,800	-	-
Miscellaneous financial loss	1,048,825	1,455,848	-	-
Non-proportional health reinsurance	-	-	-	-
Non-proportional casualty reinsurance	-	-	-	-
Non-proportional marine, aviation and transport reinsurance	-	-	-	-
Non-proportional property reinsurance	-	-	-	-

Table 68. Inputs of the calculation of the minimum capital requirement - Non-Life

Life linear formula inputs	Non-life activities		Life activities	
	Net best estimate and TP calculated as a whole	Net total capital at risk	Net best estimate and TP calculated as a whole	Net total capital at risk
Obligations with profit participation - guaranteed benefits	(48,119)		2,892,792	
Obligations with profit participation - future discretionary benefits	-		2,695,849	
Index-linked and unit-linked insurance obligations	-		113,998,831	
Other life (re)insurance and health (re)insurance obligations	694,770		129,365	
Total capital at risk for all life (re)insurance obligations		20,883,600		683,820,836

Table 69. Inputs of the calculation of the minimum capital requirement - Life

Overall MCR calculation	
Linear MCR	5,159,248
SCR	16,934,247
MCR cap	7,620,411
MCR floor	4,233,562
Combined MCR	5,159,248
Absolute floor of the MCR	2,856,000
Minimum Capital Requirement	5,159,248

Table 70. Calculation of the minimum capital requirement

### E.3 Use of the Duration-based Equity Risk Sub-module in the Calculation of the Solvency Capital Requirement

UNIQA Biztosító Zrt. does not use the duration-based equity risk sub-module for calculating the SCR.

### E.4 Differences Between the Standard Formula and Any Internal Model Used

The partial internal model (PIM) used by UNIQA Biztosító Zrt. has been developed by UNIQA Group. Having received supervisory approval in late 2017, the model is used for determining the solvency capital requirement (SCR) of UNIQA Group and a number of solo companies within the Group, including UNIQA Biztosító Zrt.

The aim of the partial internal model of UNIQA is to determine the risk-based capital (also called RBC) and in relation to that the amount of own funds that are to be used to absorb unforeseen losses over a specific time horizon. Currently, only the non-life underwriting risk and health underwriting risk similar to non-life (NSLT) are included in the scope of the partial internal model framework. The model covers the full non-life and health NSLT underwriting risk of UNIQA Biztosító Zrt. All other risk modules of the solvency capital requirement (e.g., market risk, credit risk, etc.) are measured and assessed according to the Solvency II standard formula.

The partial internal model is used for various purposes at UNIQA Biztosító Zrt. In addition to the regulatory SCR calculation, it also provides inputs on non-life and health NSLT risk to the following processes:

- Own Risk and Solvency Assessment (ORSA)
- Risk strategy and limit system
- Profit testing
- Solvency projection and capital planning
- Monitoring of the efficiency of reinsurance

The partial internal model aims to capture the uncertainties related to the underwriting of non-life and health NSLT direct and reinsurance contracts. The model generates a probability distribution forecast of the non-life and health NSLT economic underwriting result over a one-year time horizon via stochastic simulation. In particular, the following stochastic risk drivers are modelled:

- Premium Risk
  - Business risk: premium rates, risk years exposure and operating costs
  - Non-CAT claims: attritional losses and individual large losses
  - CAT claims: natural catastrophe losses and man-made catastrophe scenarios
- Reserve risk
  - Reserve run-off result

The following table shows the mapping between the risk categories used in the model and the risk modules of the standard formula:

Standard Formula sub-module	Partial Internal Model	
	module	sub-module
<b>Premium and Reserve Risk</b>	=>	Premium Risk Business Risk
		Premium Risk Non-CAT Risk
	=>	Reserve Risk Reserve Risk
<b>Catastrophe Risk</b>	=>	Premium Risk Natural Catastrophe Risk
	=>	Premium Risk Man-Made Catastrophe Risk
<b>Lapse Risk</b>	=>	Premium Risk Business Risk

Table 71. Mapping between the risk categories of the standard formula and the partial internal model

The following methods are used for determining the probability distributions of the modelled risk drivers:

Partial Internal Model		Methods used
Module	Sub-module	
<b>Premium Risk</b>	<b>Business Risk</b>	Stochastic model for premium rates, risk years exposure and operating costs Acquisition costs and insurance tax linked to modelled premiums
	<b>Non-Catastrophe Risk</b>	Total loss distribution for attritional losses Frequency-severity approach for individual large losses
	<b>Natural Catastrophe Risk</b>	External NatCat models for Earthquake, Flood, Winter storms and Hail Frequency-severity approach for Summer storms
	<b>Man-Made Catastrophe Risk</b>	Pre-defined scenarios at a fixed probability of occurrence
<b>Reserve Risk</b>	<b>Reserve Risk</b>	Models for claims reserve development

Table 72. Modelling of probability distributions

The aggregation of the stochastic variables in the partial internal model is done by the Gaussian copula approach, taking into account the dependencies between lines of business and between risk drivers. The assumptions on diversification and dependencies are key assumptions of the partial internal model methodology, and accordingly they are being validated on a regular basis. The dependency parameters of the Gaussian copula approach are usually derived from historical observations, and they are updated annually using the full history available. For losses, these parameters are merged with a set of predefined parameters for each source of risk through the use of a dependency ranking. This approach is called the shrinkage method. To take into account local peculiarities, expert assessments can be added later. In addition, the methodology does not allow negative dependency parameters between different claims (i.e. losses in a portfolio increasing the chance of gains in another portfolio). Negative dependencies on the other hand are allowed between business risk variables (most typically between the premium rate and the risk years exposure of a given line of business).

The confidence level for UNIQA's partial internal model RBC framework is set at 99.5% over a one-year time horizon, which corresponds to a return period of 1 in 200 years. For premium risk the ultimate view is used instead of the one-year view.

Since only one part of the business of the company is covered in the partial internal model, this part is combined with the rest of the business, which is treated according to the Solvency II standard approach. This is done using one of the integration techniques ("Technique 3") for partial internal models according to Solvency II Delegated Regulation 2015/35. The chosen integration technique also takes into account diversification effects between the part of the partial internal model and the non-internally modelled business.

The main differences between the partial internal model and the standard formula are the following:

- The standard formula uses a set of factor-based approaches and deterministic scenarios to derive a single output, i.e. the 99.5th percentile of the loss of own funds. The partial internal model on the other hand provides a probability distribution forecast of a number of key underwriting variables, including the economic underwriting result, generated from a large number of stochastic simulations.
- Instead of the standardized risk factors of the standard formula, the parameterization of the partial internal model is based on the company's own experience, therefore the results closely reflect the actual risk profile.
- The partial internal model allows a proper consideration of the risk mitigating impact of non-proportional reinsurance.
- Natural catastrophe risk in the partial internal model is measured in a more granular way than in the standard formula (postal code resolution rather than CRESTA level). The partial internal model also takes into account some natural perils (hail) that are currently not covered in the standard formula for Hungary.
- Business risk, i.e. the uncertainty of premium rates, risk years exposure and operating costs is explicitly modelled in the partial internal model.
- The partial internal model uses a more granular line-of-business structure than the standard formula, tailored to the company's portfolio.

The data used in the partial internal model is provided by different departments: Accounting, Controlling, Reinsurance, Actuarial, Risk Management, Claims and Underwriting. In addition, most of the natural catastrophe model results come from external service providers. Data quality is subject to a governance framework with a special focus on the validation of the appropriateness, accuracy, and completeness of the data used in the model.

<b>Risk category</b>	<b>Input data</b>
<b>Business Risk</b>	Forecast data (planned premiums, exposure and costs), both historical and for the modelled year Accounting data (actual premiums and costs) for historical years Historical exposure data by line of business
<b>Premium Risk - non-CAT</b>	Accounting (e.g. premiums and costs) Forecast data (e.g. planned premiums and costs) Historical claims data by each single claim Historical data of sums insured and risk years exposure Information on the reinsurance structure Information on payment patterns
<b>Premium Risk - CAT</b>	Natural catastrophes: Data on exposure and contractual limits at a granularity required by the external model Man-Made scenarios: Detailed information on sums insured and PML in force
<b>Reserve Risk</b>	Historical claims run-off data by each single claim

Table 73. Input data by risk category

## **E.5 Non-compliance with the Minimum Capital Requirement and Non-compliance with the Solvency Capital Requirement**

UNIQA Biztosító Zrt. complied with the minimum capital requirement and solvency capital requirement throughout the financial year 2022.

## **E.6 Any Other Information**

### **Extraordinary tax**

In 2022, the Hungarian Government imposed an extraordinary tax on financial and other sectors. This extraordinary tax put a significant burden on the Company's 2022 profitability and will have great impact on next year's result as well. This next-year effect was taken into account in the Technical Provisions as well. The impact of this significant tax has a serious impact on the Company's solvency capital position, as we presented above. The Company, with the help of the above presented risk management processes, are currently working on restoring the solvency ratio to a level adhering to the Volatility Capital Buffer required by the Regulator. Without the extraordinary tax the Company's Solvency Ratio would be well above the required 150%.

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## Appendix I - Regulatory Requirements for the SFCR

The regulatory requirements for the SFCR with which the report is compliant are laid out in the following paragraphs. Besides these regulatory requirements, this document also complies with Article 51 and Article 56 of the Directive 2009/138/EG (Level 1).

### Chapter A

This chapter contains information on the business of the company and its performance according to Article 293 of the Commission Delegated Regulation (EU) 2015/35 (Level 2) as well as Guidelines 1 and 2 EIOPA-BoS-15/109 (Level 3).

### Chapter B

This chapter contains information on the governance system of the company according to Article 294 of the Commission Delegated Regulation (EU) 2015/35 (Level 2) as well as Guidelines 3 and 4 EIOPA-BoS-15/109 (Level 3).

### Chapter C

This chapter contains information on the risk profile of the company according to Article 295 of the Commission Delegated Regulation (EU) 2015/35 (Level 2) as well as Guideline 5 EIOPA-BoS-15/109 (Level 3).

### Chapter D

This chapter contains information on the evaluation requirements for Solvency II according to Article 296 of the Commission Delegated Regulation (EU) 2015/35 (Level 2) as well as Guidelines 6 to 10 EIOPA-BoS-15/109 (Level 3).

### Chapter E

This chapter contains information on the capital management of the company according to Article 297 and Article 298 of the Commission Delegated Regulation (EU) 2015/35 (Level 2) as well as Guidelines 11 to 13 EIOPA-BoS-15/109 (Level 3).

## Appendix II - Quantitative Reporting Templates

In this appendix the following Quantitative Reporting Templates (QRTs) are presented (thousand HUF):

- S.02.01.02 Balance sheet
- S.05.01.02 Premiums, claims and expenses by line of business
- S.05.02.01 Premiums, claims and expenses by country
- S.12.01.02 Life and Health SLT Technical Provisions
- S.17.01.02 Non-life Technical Provisions
- S.19.01.21 Non-life insurance claims, Total Non-Life Business
- S.22.01.21 Impact of long term guarantees and transitional measures
- S.23.01.01 Own funds
- S.25.02.01 Solvency Capital Requirement - for undertakings using the standard formula and partial internal model
- 28.02.01 Minimum Capital Requirement - Both life and non-life insurance activity

**S.02.01.02: Balance sheet**

		Solvency II value
		C0010
<b>Assets</b>		
Intangible assets	R0030	
Deferred tax assets	R0040	
Pension benefit surplus	R0050	
Property, plant & equipment held for own use	R0060	1,598,035
Investments (other than assets held for index-linked and unit-linked contracts)	R0070	32,011,337
Property (other than for own use)	R0080	
Holdings in related undertakings, including participations	R0090	750,577
Equities	R0100	
Equities - listed	R0110	
Equities - unlisted	R0120	
Bonds	R0130	30,272,048
Government Bonds	R0140	27,106,233
Corporate Bonds	R0150	3,165,815
Structured notes	R0160	
Collateralised securities	R0170	
Collective Investments Undertakings	R0180	981,204
Derivatives	R0190	7,507
Deposits other than cash equivalents	R0200	
Other investments	R0210	
Assets held for index-linked and unit-linked contracts	R0220	126,777,484
Loans and mortgages	R0230	9,801
Loans on policies	R0240	9,801
Loans and mortgages to individuals	R0250	
Other loans and mortgages	R0260	
Reinsurance recoverables from:	R0270	10,141,530
Non-life and health similar to non-life	R0280	8,523,843
Non-life excluding health	R0290	8,489,997
Health similar to non-life	R0300	33,846
Life and health similar to life, excluding health and index-linked and unit-linked	R0310	1,617,686
Health similar to life	R0320	44,979
Life excluding health and index-linked and unit-linked	R0330	1,572,707
Life index-linked and unit-linked	R0340	
Deposits to cedants	R0350	
Insurance and intermediaries receivables	R0360	4,509,993
Reinsurance receivables	R0370	1,175,298
Receivables (trade, not insurance)	R0380	502,257
Own shares (held directly)	R0390	
Amounts due in respect of own fund items or initial fund called up but not yet paid in	R0400	
Cash and cash equivalents	R0410	4,304,895
Any other assets, not elsewhere shown	R0420	2,605,023
<b>Total assets</b>	<b>R0500</b>	<b>183,635,651</b>

	Solvency II value
	C0010
<b>Liabilities</b>	
Technical provisions – non-life	R0510 22,957,979
Technical provisions – non-life (excluding health)	R0520 22,355,268
Technical provisions calculated as a whole	R0530
Best Estimate	R0540 21,712,198
Risk margin	R0550 643,071
Technical provisions - health (similar to non-life)	R0560 602,710
Technical provisions calculated as a whole	R0570
Best Estimate	R0580 582,751
Risk margin	R0590 19,960
Technical provisions - life (excluding index-linked and unit-linked)	R0600 8,336,140
Technical provisions - health (similar to life)	R0610 55,576
Technical provisions calculated as a whole	R0620
Best Estimate	R0630 51,022
Risk margin	R0640 4,553
Technical provisions – life (excluding health and index-linked and unit-linked)	R0650 8,280,564
Technical provisions calculated as a whole	R0660
Best Estimate	R0670 7,979,441
Risk margin	R0680 301,123
Technical provisions – index-linked and unit-linked	R0690 116,086,978
Technical provisions calculated as a whole	R0700
Best Estimate	R0710 113,998,831
Risk margin	R0720 2,088,147
Other technical provisions	R0730
Contingent liabilities	R0740
Provisions other than technical provisions	R0750 240,150
Pension benefit obligations	R0760
Deposits from reinsurers	R0770 42,462
Deferred tax liabilities	R0780 438,750
Derivatives	R0790
Debts owed to credit institutions	R0800
Financial liabilities other than debts owed to credit institutions	R0810 810,178
Insurance & intermediaries payables	R0820 5,390,981
Reinsurance payables	R0830 2,188,383
Payables (trade, not insurance)	R0840 2,141,315
Subordinated liabilities	R0850 5,951,882
Subordinated liabilities not in Basic Own Funds	R0860
Subordinated liabilities in Basic Own Funds	R0870 5,951,882
Any other liabilities, not elsewhere shown	R0880 1,487,168
Total liabilities	R0900 166,072,366
<b>Excess of assets over liabilities</b>	R1000 17,563,284

S.05.01.02 Premiums, claims and expenses by line of business

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)								
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance
		C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090
<b>Premiums written</b>										
Gross - Direct Business	R0110		4,083,784		16,212,520	16,425,632	770,598	12,204,985	2,182,724	
Gross - Proportional reinsurance accepted	R0120						190	349,788	18,120	
Gross - Non-proportional reinsurance accepted	R0130									
Reinsurers' share	R0140		277,971		8,481,551	8,799,746	504,254	7,388,834	1,511,948	
Net	R0200		3,805,813		7,730,970	7,625,886	266,533	5,165,939	688,896	
<b>Premiums earned</b>										
Gross - Direct Business	R0210		3,993,723		15,962,457	15,702,968	729,503	11,150,212	2,210,949	
Gross - Proportional reinsurance accepted	R0220						128	332,598	16,437	
Gross - Non-proportional reinsurance accepted	R0230									
Reinsurers' share	R0240		277,599		8,356,229	8,438,171	485,150	6,825,263	1,492,825	
Net	R0300		3,716,124		7,606,228	7,264,796	244,480	4,657,547	734,561	
<b>Claims incurred</b>										
Gross - Direct Business	R0310		1,202,978		8,545,776	9,373,617	109,110	2,640,366	1,303,065	
Gross - Proportional reinsurance accepted	R0320							-21,374	74	
Gross - Non-proportional reinsurance accepted	R0330									
Reinsurers' share	R0340		60,827		4,856,068	4,708,808	56,899	1,564,899	1,021,260	
Net	R0400		1,142,151		3,689,708	4,664,809	52,212	1,054,093	281,880	
<b>Changes in other technical provisions</b>										
Gross - Direct Business	R0410		79,455		-137,022	16,769	-23,385	-54,555	-38,158	
Gross - Proportional reinsurance accepted	R0420									
Gross - Non-proportional reinsurance accepted	R0430									
Reinsurers' share	R0440		-1,695		-77,872	20,449	-9,023	-69,122	-38,190	
Net	R0500		81,150		-59,150	-3,679	-14,362	14,567	32	
Expenses incurred	R0550		2,055,701		1,812,162	988,540	130,262	1,691,618	465,194	
Other expenses	R1200									
Total expenses	R1300									

		Line of Business for: non-life insurance and reinsurance obligations (direct business and accepted proportional reinsurance)			Line of business for: accepted non-proportional reinsurance				Total
		Legal expenses insurance	Assistance	Miscellaneous financial loss	Health	Casualty	Marine, aviation, transport	Property	
		C0100	C0110	C0120	C0130	C0140	C0150	C0160	C0200
<b>Premiums written</b>									
Gross - Direct Business	R0110	11,815	576,800	3,283,244					55,752,101
Gross - Proportional reinsurance accepted	R0120			357,553					725,651
Gross - Non-proportional reinsurance accepted	R0130								
Reinsurers' share	R0140			2,184,949					29,149,253
Net	R0200	11,815	576,800	1,455,848					27,328,499
<b>Premiums earned</b>									
Gross - Direct Business	R0210	12,105	575,205	2,635,781					52,972,902
Gross - Proportional reinsurance accepted	R0220			360,439					709,601
Gross - Non-proportional reinsurance accepted	R0230								
Reinsurers' share	R0240		57	1,755,444					27,630,738
Net	R0300	12,105	575,148	1,240,776					26,051,765
<b>Claims incurred</b>									
Gross - Direct Business	R0310	13,678	208,986	1,015,183					24,412,760
Gross - Proportional reinsurance accepted	R0320			686,400					665,100
Gross - Non-proportional reinsurance accepted	R0330								
Reinsurers' share	R0340		2,344	980,898					13,252,004
Net	R0400	13,678	206,642	720,685					11,825,856
<b>Changes in other technical provisions</b>									
Gross - Direct Business	R0410		2,017	7,635					-147,244
Gross - Proportional reinsurance accepted	R0420								
Gross - Non-proportional reinsurance accepted	R0430								
Reinsurers' share	R0440		877	-6,174					-180,750
Net	R0500		1,140	13,809					33,506
Expenses incurred	R0550	981	424,251	596,558					8,165,267
Other expenses	R1200								455,613
Total expenses	R1300								8,620,880

		Line of Business for: life insurance obligations					Life reinsurance obligations		Total	
		Health insurance	Insurance with profit participation	Index-linked and unit-linked insurance	Other life insurance	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Annuities stemming from non-life insurance contracts and relating to insurance obligations other than health insurance obligations	Health reinsurance	Life reinsurance	
		C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0300
<b>Premiums written</b>										
Gross	R1410	817,717	1,026,966	27,509,748	2,186,836					31,541,267
Reinsurers' share	R1420	130,969			257,343					388,312
Net	R1500	686,748	1,026,966	27,509,748	1,929,493					31,152,955
<b>Premiums earned</b>										
Gross	R1510	827,951	1,033,327	27,509,748	2,160,418					31,531,445
Reinsurers' share	R1520	124,269			255,575					379,844
Net	R1600	703,682	1,033,327	27,509,748	1,904,844					31,151,601
<b>Claims incurred</b>										
Gross	R1610	279,111	1,499,654	19,852,613	902,310					22,533,689
Reinsurers' share	R1620				153,425					153,425
Net	R1700	279,111	1,499,654	19,852,613	748,885					22,380,263
<b>Changes in other technical provisions</b>										
Gross	R1710	-4,304	500,776	8,081,455	83,731					8,661,657
Reinsurers' share	R1720				-232					-232
Net	R1800	-4,304	500,776	8,081,455	83,963					8,661,890
<b>Expenses incurred</b>	R1900	3,477	371,049	5,519,964	1,118,892					7,013,381
<b>Other expenses</b>	R2500									570
<b>Total expenses</b>	R2600									7,013,951

**S.05.02.01 Premiums, claims and expenses by country**

	Home Country	Top 5 countries (by amount of gross premiums written) — nonlife obligations					Total Top 5 and home country	
		C0010	C0020	C0030	C0040	C0050		C0060
	R0110							
		C0080	C0090	C0100	C0110	C0120	C0130	C0140
<b>Premiums written</b>								
Gross - Direct Business	R0110	55,706,910						55,750,737
Gross - Proportional reinsurance accepted	R0120	725,651						725,651
Gross - Non-proportional reinsurance accepted	R0130							
Reinsurers' share	R0140	29,110,073						29,148,476
Net	R0200	27,322,487						27,327,912
<b>Premiums earned</b>								
Gross - Direct Business	R0210	52,927,711						52,971,538
Gross - Proportional reinsurance accepted	R0220	709,601						709,601
Gross - Non-proportional reinsurance accepted	R0230							
Reinsurers' share	R0240	27,591,559						27,629,961
Net	R0300	26,045,754						26,051,178
<b>Claims incurred</b>								
Gross - Direct Business	R0310	24,370,082						24,412,760
Gross - Proportional reinsurance accepted	R0320	665,100						665,100
Gross - Non-proportional reinsurance accepted	R0330							
Reinsurers' share	R0340	13,209,326						13,252,004
Net	R0400	11,825,856						11,825,856
<b>Changes in other technical provisions</b>								
Gross - Direct Business	R0410	-147,244						-147,244
Gross - Proportional reinsurance accepted	R0420							
Gross - Non-proportional reinsurance accepted	R0430							
Reinsurers' share	R0440	-180,750						-180,750
Net	R0500	33,506						33,506
<b>Expenses incurred</b>	R0550	8,165,267						8,165,267
<b>Other expenses</b>	R1200							455,613
<b>Total expenses</b>	R1300							8,620,880

	Home Country	Top 5 countries (by amount of gross premiums written) — life obligations					Total Top 5 and home country	
		C0150	C0160	C0170	C0180	C0190		C0200
	R0110							
		C0220	C0230	C0240	C0250	C0260	C0270	C0280
<b>Premiums written</b>								
Gross	R1410	31,541,267						31,541,267
Reinsurers' share	R1420	388,312						388,312
Net	R1500	31,152,955						31,152,955
<b>Premiums earned</b>								
Gross	R1510	31,531,445						31,531,445
Reinsurers' share	R1520	379,844						379,844
Net	R1600	31,151,601						31,151,601
<b>Claims incurred</b>								
Gross	R1610	22,527,036						22,533,689
Reinsurers' share	R1620	150,099						153,425
Net	R1700	22,376,937						22,380,263
<b>Changes in other technical provisions</b>								
Gross	R1710	8,661,657						8,661,657
Reinsurers' share	R1720	-232						-232
Net	R1800	8,661,890						8,661,890
<b>Expenses incurred</b>	R1900	7,013,381						7,013,381
<b>Other expenses</b>	R2500							570
<b>Total expenses</b>	R2600							7,013,951



**S.12.01.02 Life and Health SLT Technical Provisions**

	Insurance with profit participation	Index-linked and unit-linked insurance			Other life insurance			Annuities stemming from non-life insurance contracts and relating to insurance obligation other than health insurance obligations	Accepted reinsurance	Total (Life other than health insurance, incl. Unit-Linked)
			Contracts without options and guarantees	Contracts with options or guarantees		Contracts without options and guarantees	Contracts with options or guarantees			
		C0020	C0030	C0040	C0050	C0060	C0070			
<b>Technical provisions calculated as a whole</b>	R0010									
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0020									
<b>Technical provisions calculated as a sum of BE and RM</b>										
<b>Best Estimate</b>										
<b>Gross Best Estimate</b>	R0030	5,588,640		113,998,831			467,991	-285,302	2,208,112	121,978,272
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0080						53,324		1,519,383	1,572,707
Best estimate minus recoverables from reinsurance/SPV and Finite Re	R0090	5,588,640		113,998,831			414,667	-285,302	688,728	120,405,565
<b>Risk Margin</b>	R0100	71,781	2,088,147			114,573			114,769	2,389,270
<b>Amount of the transitional on Technical Provisions</b>										
Technical Provisions calculated as a whole	R0110									
Best estimate	R0120									
Risk margin	R0130									
<b>Technical provisions - total</b>	R0200	5,660,422	116,086,978			297,262			2,322,881	124,367,543

		Health insurance (direct business)				
		Contracts without options and guarantees	Contracts with options or guarantees	Annuities stemming from non-life insurance contracts and relating to health insurance obligations	Health reinsurance (reinsurance accepted)	Total (Health similar to life insurance)
		C0160	C0170	C0180	C0190	C0200
<b>Technical provisions calculated as a whole</b>	R0010					
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0020					
<b>Technical provisions calculated as a sum of BE and RM</b>						
<b>Best Estimate</b>						
<b>Gross Best Estimate</b>	R0030		51,022			51,022
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0080		44,979			44,979
Best estimate minus recoverables from reinsurance/SPV and Finite Re	R0090		6,043			6,043
<b>Risk Margin</b>	R0100					4,553
<b>Amount of the transitional on Technical Provisions</b>						
Technical Provisions calculated as a whole	R0110					
Best estimate	R0120					
Risk margin	R0130					
<b>Technical provisions - total</b>	R0200	55,576				55,576

**S.17.01.02 Non-life Technical Provisions**

		Direct business and accepted proportional reinsurance								
		Medical expense insurance	Income protection insurance	Workers' compensation insurance	Motor vehicle liability insurance	Other motor insurance	Marine, aviation and transport insurance	Fire and other damage to property insurance	General liability insurance	Credit and suretyship insurance
		C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100
<b>Technical provisions calculated as a whole</b>	R0010									
Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole	R0050									
<b>Technical provisions calculated as a sum of BE and RM</b>										
<b>Best estimate</b>										
Premium provisions										
Gross - Total	R0060		274,803		2,344,602	3,540,971	-33,973	2,728,566	60,979	
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0140		10,140		190,224	1,181,744	-117,978	672,876	-285,406	
Net Best Estimate of Premium Provisions	R0150		264,663		2,154,378	2,359,228	84,004	2,055,690	346,385	
<b>Claims provisions</b>										
Gross - Total	R0160		307,948		6,728,270	1,390,929	43,517	1,165,248	1,675,016	
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default	R0240		23,706		3,756,057	700,121	27,148	660,928	902,303	
Net Best Estimate of Claims Provisions	R0250		284,242		2,972,213	690,808	16,369	504,320	772,713	
<b>Total Best estimate - gross</b>	R0260		582,751		9,072,873	4,931,900	9,544	3,893,814	1,735,995	
<b>Total Best estimate - net</b>	R0270		548,905		5,126,592	3,050,035	100,373	2,560,010	1,119,098	
<b>Risk margin</b>	R0280		19,960		347,671	102,467	334	130,376	34,909	
<b>Amount of the transitional on Technical Provisions</b>										
TP as a whole	R0290									
Best estimate	R0300									
Risk margin	R0310									
<b>Technical provisions - total</b>										
Technical provisions - total	R0320		602,710		9,420,543	5,034,367	9,878	4,024,191	1,770,904	
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total	R0330		33,846		3,946,281	1,881,865	-90,829	1,333,804	616,897	
Technical provisions minus recoverables from reinsurance/SPV and Finite Re- total	R0340		568,864		5,474,262	3,152,502	100,707	2,690,387	1,154,007	

	Direct business and accepted proportional reinsurance			Accepted non-proportional reinsurance				Total Non-Life obligation
	Legal expenses insurance	Assistance	Miscellaneous financial loss	Non-proportional health reinsurance	Non-proportional casualty reinsurance	Non-proportional marine, aviation and transport reinsurance	Non-proportional property reinsurance	
	C0110	C0120	C0130	C0140	C0150	C0160	C0170	
<b>Technical provisions calculated as a whole</b>								
<b>Total Recoverables from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default associated to TP calculated as a whole</b>								
<b>Technical provisions calculated as a sum of BE and RM</b>								
<b>Best estimate</b>								
Premium provisions								
Gross - Total								
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default								
Net Best Estimate of Premium Provisions								
<b>Claims provisions</b>								
Gross - Total								
Total recoverable from reinsurance/SPV and Finite Re after the adjustment for expected losses due to counterparty default								
Net Best Estimate of Claims Provisions								
<b>Total Best estimate - gross</b>								
<b>Total Best estimate - net</b>								
<b>Risk margin</b>								
<b>Amount of the transitional on Technical Provisions</b>								
TP as a whole								
Best estimate								
Risk margin								
<b>Technical provisions - total</b>								
Technical provisions - total								
Recoverable from reinsurance contract/SPV and Finite Re after the adjustment for expected losses due to counterparty default - total								
Technical provisions minus recoverables from reinsurance/SPV and Finite Re - total								

**S.19.01.21 Non-life insurance claims, Total Non-Life Business**

Accident year / Underwriting year 

Z0010	Accident year
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Gross Claims Paid (non-cumulative)  
(absolute amount)

Year	Development year											
	0	1	2	3	4	5	6	7	8	9	10 & +	
	C0010	C0020	C0030	C0040	C0050	C0060	C0070	C0080	C0090	C0100	C0110	
Prior	R0100											
N-9	R0160	11,917,100	4,112,565	747,985	357,242	147,608	165,735	370,901	64,708	112,798	29,123	36,964
N-8	R0170	11,531,847	4,282,871	857,028	448,482	259,568	236,699	348,526	70,790	27,026		
N-7	R0180	10,125,593	5,065,671	878,992	322,936	168,322	126,519	187,077	60,992			
N-6	R0190	10,603,006	4,028,581	929,765	543,985	205,779	228,955	219,968				
N-5	R0200	12,463,585	5,253,928	879,087	711,003	115,831	203,108					
N-4	R0210	13,769,203	5,616,379	1,022,615	475,100	725,885						
N-3	R0220	14,694,156	4,612,363	463,265	343,295							
N-2	R0230	14,683,581	3,205,819	951,473								
N-1	R0240	15,983,702	5,205,319									
N	R0250	17,005,417										

Gross undiscounted Best Estimate Claims Provisions  
(absolute amount)

Year	Development year											
	0	1	2	3	4	5	6	7	8	9	10 & +	
	C0200	C0210	C0220	C0230	C0240	C0250	C0260	C0270	C0280	C0290	C0300	
Prior	R0100											432,383
N-9	R0160											
N-8	R0170											
N-7	R0180							1,034,635		345,714		
N-6	R0190						238,705					
N-5	R0200					297,930						
N-4	R0210				991,236							
N-3	R0220				787,705							
N-2	R0230			679,372								
N-1	R0240		1,542,116									
N	R0250	8,422,355										

	In Current year		Sum of years (cumulative)
	C0170	C0180	
R0100	36,964	93,502,585	
R0160	29,123	18,025,766	
R0170	27,026	18,062,837	
R0180	60,992	16,936,103	
R0190	219,968	16,760,038	
R0200	203,108	19,626,542	
R0210	725,885	21,609,182	
R0220	343,295	20,113,079	
R0230	951,473	18,840,874	
R0240	5,205,319	21,189,021	
R0250	17,005,417	17,005,417	
Total	R0260	24,808,571	281,671,443

	Year end (discounted data)	
	C0360	C0300
R0100	302,496	
R0160	52,199	
R0170	267,843	
R0180	798,142	
R0190	187,510	
R0200	240,868	
R0210	820,199	
R0220	635,418	
R0230	531,951	
R0240	1,200,624	
R0250	7,190,596	
Total	R0260	12,227,845

**S.22.01.21 Impact of long term guarantees and transitional measures**

		Amount with Long Term Guarantee measures and transitionals	Impact of transitional on technical provisions	Impact of transitional on interest rate	Impact of volatility adjustment set to zero	Impact of matching adjustment set to zero
		C0010	C0030	C0050	C0070	C0090
Technical provisions	R0010	147,381,097			16,255	
Basic own funds	R0020	23,515,166			16,417	
Eligible own funds to meet Solvency Capital Requirement	R0050	23,515,166			16,417	
Solvency Capital Requirement	R0090	16,934,247			-162,483	
Eligible own funds to meet Minimum Capital Requirement	R0100	18,595,134			17,022	
Minimum Capital Requirement	R0110	5,159,248			3,028	

**S.23.01.01 Own funds**

	Total	Tier 1 - unrestricted	Tier 1 - restricted	Tier 2	Tier 3
	C0010	C0020	C0030	C0040	C0050
<b>Basic own funds before deduction for participations in other financial sector as foreseen in article 68 of Delegated Regulation 2015/35</b>					
Ordinary share capital (gross of own shares) R0010	4,079,160	4,079,160			
Share premium account related to ordinary share capital R0030	4,605,922	4,605,922			
Initial funds, members' contributions or the equivalent basic own - fund item for mutual and mutual-type undertakings R0040					
Subordinated mutual member accounts R0050					
Surplus funds R0070					
Preference shares R0090					
Share premium account related to preference shares R0110					
Reconciliation reserve R0130	8,878,202	8,878,202			
Subordinated liabilities R0140	5,951,882			5,951,882	
An amount equal to the value of net deferred tax assets R0160					
Other own fund items approved by the supervisory authority as basic own funds not specified above R0180					
<b>Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds</b>					
Own funds from the financial statements that should not be represented by the reconciliation reserve and do not meet the criteria to be classified as Solvency II own funds R0220					
<b>Deductions</b>					
Deductions for participations in financial and credit institutions R0230					
<b>Total basic own funds after deductions R0290</b>	<b>23,515,166</b>	<b>17,563,284</b>		<b>5,951,882</b>	
<b>Ancillary own funds</b>					
Unpaid and uncalled ordinary share capital callable on demand R0300					
Unpaid and uncalled initial funds, members' contributions or the equivalent basic own fund item for mutual and mutual - type undertakings, callable on demand R0310					
Unpaid and uncalled preference shares callable on demand R0320					
A legally binding commitment to subscribe and pay for subordinated liabilities on demand R0330					
Letters of credit and guarantees under Article 96(2) of the Directive 2009/138/EC R0340					
Letters of credit and guarantees other than under Article 96(2) of the Directive 2009/138/EC R0350					
Supplementary members calls under first subparagraph of Article 96(3) of the Directive 2009/138/EC R0360					
Supplementary members calls - other than under first subparagraph of Article 96(3) of the Directive 2009/138/EC R0370					
Other ancillary own funds R0390					
<b>Total ancillary own funds R0400</b>					
<b>Available and eligible own funds</b>					
Total available own funds to meet the SCR R0500	23,515,166	17,563,284		5,951,882	
Total available own funds to meet the MCR R0510	23,515,166	17,563,284		5,951,882	
Total eligible own funds to meet the SCR R0540	23,515,166	17,563,284		5,951,882	
Total eligible own funds to meet the MCR R0550	18,595,134	17,563,284		1,031,850	
<b>SCR R0580</b>	<b>16,934,247</b>				
<b>MCR R0600</b>	<b>5,159,248</b>				
<b>Ratio of Eligible own funds to SCR R0620</b>	<b>138.86%</b>				
<b>Ratio of Eligible own funds to MCR R0640</b>	<b>360.42%</b>				

		C0060	
<b>Reconciliation reserve</b>			
Excess of assets over liabilities	R0700	17,563,284	
Own shares (held directly and indirectly)	R0710		
Foreseeable dividends, distributions and charges	R0720		
Other basic own fund items	R0730	8,685,082	
Adjustment for restricted own fund items in respect of matching adjustment portfolios and ring fenced funds	R0740		
<b>Reconciliation reserve</b>	R0760	8,878,202	
<b>Expected profits</b>			
Expected profits included in future premiums (EPIFP) - Life business	R0770	13,692,214	
Expected profits included in future premiums (EPIFP) - Non-life business	R0780	1,853,866	
<b>Total Expected profits included in future premiums (EPIFP)</b>	R0790	15,546,081	



**S.25.02.01 Solvency Capital Requirement - for undertakings using the standard formula and partial internal model**

Unique number of component	Components Description	Calculation of the Solvency Capital Requirement	Allocation from adjustments due to RFF and Matching adjustments portfolios	Consideration of the future management actions regarding technical provisions and/or deferred taxes	Amount modelled
C0010	C0020	C0030	C0050	C0060	C0070
1	Market Risk	6,322,866		bsorbing capacity of techn	
2	Counterparty Default Risk	2,254,838		nsideration of future man	
3	Life Underwriting Risk	6,423,311		bsorbing capacity of techn	
4	Health Underwriting Risk	37,472		nsideration of future man	
5	Non-Life Underwriting Risk	7,847,005		nsideration of future man	7,847,005
6	Intangible asset risk	0		nsideration of future man	
7	Operational Risk	2,331,669		nsideration of future man	
8	LAC Technical Provisions	-225,260		nsideration of future man	
9	LAC Deferred Taxes	-438,750		nsideration of future man	

		C0100
Total undiversified components	R0110	24,553,150
Diversification	R0060	-7,618,903
Adjustment due to RFF/MAP nSCR aggregation	R0120	0
Capital requirement for business operated in accordance with Art. 4 of Directive 2003/41/EC	R0160	0
Solvency capital requirement excluding capital add-on	R0200	16,934,247
Capital add-ons already set	R0210	0
Solvency capital requirement	R0220	16,934,247
<b>Other information on SCR</b>		
Amount/estimate of the overall loss-absorbing capacity of technical provisions	R0300	-225,260
Amount/estimate of the overall loss-absorbing capacity of deferred taxes	R0310	-438,750
Capital requirement for duration-based equity risk sub-module	R0400	
Total amount of Notional Solvency Capital Requirements for remaining part	R0410	
Total amount of Notional Solvency Capital Requirement for ring fenced funds	R0420	
Total amount of Notional Solvency Capital Requirement for matching adjustment portfolios	R0430	
Diversification effects due to RFF nSCR aggregation for article 304	R0440	
Method used to calculate the adjustment due to RFF/MAP nSCR aggregation	R0450	
Net future discretionary benefits	R0460	2,702,748
		Yes/No
		C0109
Approach based on average tax rate	R0590	Yes

		LAC DT
		C0130
Amount/estimate of LAC DT	R0640	-438,750
Amount/estimate of LAC DT justified by reversion of deferred tax liabilities	R0650	
Amount/estimate of LAC DT justified by reference to probable future taxable economic profit	R0660	
Amount/estimate of AC DT justified by carry back, current year	R0670	
Amount/estimate of LAC DT justified by carry back, future years	R0680	
Amount/estimate of Maximum LAC DT	R0690	

**S.28.02.01 Minimum Capital Requirement - Both life and non-life insurance activity**

	MCR components	
	Non-life activities	Life activities
	MCR(NL, NL) Result	MCR(NL, L)Result
	C0010	C0020
<b>R0010</b>	3,702,040	

**Linear formula component for non-life insurance and reinsurance obligations**

		Non-life activities		Life activities	
		Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance) written premiums in the last 12 months
		C0030	C0040	C0050	C0060
Medical expense insurance and proportional reinsurance	<b>R0020</b>				
Income protection insurance and proportional reinsurance	<b>R0030</b>	548,905	3,805,813		
Workers' compensation insurance and proportional reinsurance	<b>R0040</b>				
Motor vehicle liability insurance and proportional reinsurance	<b>R0050</b>	5,126,592	7,730,970		
Other motor insurance and proportional reinsurance	<b>R0060</b>	3,050,035	7,625,886		
Marine, aviation and transport insurance and proportional reinsurance	<b>R0070</b>	100,373	266,533		
Fire and other damage to property insurance and proportional reinsurance	<b>R0080</b>	2,560,010	5,165,939		
General liability insurance and proportional reinsurance	<b>R0090</b>	1,119,098	688,896		
Credit and suretyship insurance and proportional reinsurance	<b>R0100</b>				
Legal expenses insurance and proportional reinsurance	<b>R0110</b>	9,492	11,815		
Assistance and proportional reinsurance	<b>R0120</b>	207,775	576,800		
Miscellaneous financial loss insurance and proportional reinsurance	<b>R0130</b>	1,048,825	1,455,848		
Non-proportional health reinsurance	<b>R0140</b>				
Non-proportional casualty reinsurance	<b>R0150</b>				
Non-proportional marine, aviation and transport reinsurance	<b>R0160</b>				
Non-proportional property reinsurance	<b>R0170</b>				

	Non-life activities		Life activities	
	MCR(L, NL) Result	MCR(L, L) Result		
	C0070	C0080		
<b>R0200</b>	29,209	1,246,232		

**Linear formula component for life insurance and reinsurance obligations**

	Non-life activities		Life activities	
	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk	Net (of reinsurance/SPV) best estimate and TP calculated as a whole	Net (of reinsurance/SPV) total capital at risk
	C0090	C0100	C0110	C0120
Obligations with profit participation - guaranteed benefits	R0210	-48,119		2,892,792
Obligations with profit participation - future discretionary benefits	R0220			2,695,849
Index-linked and unit-linked insurance obligations	R0230			113,998,831
Other life (re)insurance and health (re)insurance obligations	R0240	694,770		129,365
Total capital at risk for all life (re)insurance obligations	R0250		20,883,600	683,820,836

**Overall MCR calculation**

		C0130
Linear MCR	R0300	5,159,248
SCR	R0310	16,934,247
MCR cap	R0320	7,620,411
MCR floor	R0330	4,233,562
Combined MCR	R0340	5,159,248
Absolute floor of the MCR	R0350	2,856,000
<b>Minimum Capital Requirement</b>	<b>R0400</b>	<b>5,159,248</b>

**Notional non-life and life MCR calculation**

		Non-life activities	Life activities
		C0140	C0150
Notional linear MCR	R0500	3,731,248	1,246,232
Notional SCR excluding add-on (annual or latest calculation)	R0510	12,694,350	4,239,897
Notional MCR cap	R0520	5,712,458	1,907,954
Notional MCR floor	R0530	3,173,588	1,059,974
Notional Combined MCR	R0540	3,731,248	1,246,232
Absolute floor of the notional MCR	R0550	1,428,000	1,428,000
Notional MCR	R0560	3,731,248	1,428,000